

Exhibit No.:
Issue(s): Customer Applications
Witness: Mark Kiesling
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: WR-2017-0343
Date Testimony Prepared: January 29, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

WATER AND SEWER DEPARTMENT

REBUTTAL TESTIMONY

OF

MARK KIESLING

GASCONY WATER COMPANY, INC.

CASE NO. WR-2017-0343

Jefferson City, Missouri
January 2018

REBUTTAL TESTIMONY
OF
MARK KIESLING
GASCONY WATER COMPANY, INC.
CASE NO. WR-2017-0343

Q. Please state your name and business address.

A. Mark Kiesling, 200 Madison Street, Jefferson City, MO 65102.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as a Utility Management Analyst III in the Energy Resources Department of the Commission Staff ("Staff"). Before January 18, 2018, I was employed as a Utility Management Analyst II in the Consumer Experience Department.

Q. Please describe your educational background and other qualifications.

A. I received a Bachelor of Science Degree in Marketing from Lincoln University in May of 2001. Prior to joining the Commission in October of 2014, I was employed by the State of Missouri - Department of Economic Development as a Project Manager.

Q. Have you previously filed testimony before this Commission?

A. No.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to the Direct Testimony of Mr. James M. Russo filed in Case No. WR-2017-0343. Specifically, I will address Mr. Russo's comments on page 18, lines 7 through 18. In this section of his testimony, Mr. Russo expresses a partial disagreement to Staff's recommendation that the Company start

1 using an application for all new customers within thirty (30) days after the effective date of
2 the Commission order that resolves Case No. WR-2017-0343. My testimony will provide the
3 Commission with considerations to evaluate why this recommendation and time frame are
4 appropriate.

5 Q. What is Staff's recommendation regarding customer applications?

6 A. Staff's recommendation is:

7 Ensure all new customers complete an application for
8 service per the Company's tariff. This requirement
9 should be completed within thirty (30) days of the
10 effective date of the Commission order that resolves
11 Case No. WR-2017-0343.

12 Q. What specifically is the Company's disagreement with Staff's
13 recommendation?

14 A. Specifically Mr. Russo's testimony on page 18, lines 7 through 18 states:

15 The Company disagrees with the thirty-day completion
16 requirement recommended by CMAU because it is
17 doubtful whether or not the Company will have any new
18 customers in this time period.

19 Q. Why does the Company believe it cannot complete this recommendation?

20 A. According to Mr. Russo's testimony, the Company cannot agree with this
21 recommendation knowing it is extremely unlikely that the Company will acquire any new
22 customers within this time period. The Company cannot knowingly put itself in the position
23 of agreeing to something that results in the Company violating a Commission order.

24 Q. Does it appear that the Company understands Staff's recommendation?

25 A. No

Rebuttal Testimony of
Mark Kiesling

1 Q. Please explain.

2 A. As Staff understands the Company's testimony, the Company seems to be
3 implying that Staff is requiring the Company to acquire new customers within 30 days of the
4 Report and Order. Staff is not making that recommendation. Staff is simply recommending
5 that the Company utilize its existing customer application within 30 days of the Report and
6 Order for any future new customers that want to take service from the Company.

7 Q. What is the purpose of a customer application?

8 A. An application serves as the documentation and record that an applicant has
9 requested service, provides important information such as customer contact information, and
10 identifies the party responsible for payment.

11 Q. Does the Company agree with the recommendations that Staff made in regards
12 to using a customer application?

13 A. Yes. In Mr. Russo's testimony specifically page 17, line 18 and line 19 states:
14 The Company agrees that all new customers need to
15 complete an application for service.

16 Q. Is a customer application required in the Company's Tariff?

17 A. Yes. Per the Company Tariff on sheet 14, Rule 4 (a) states:
18 A written application for service, signed by the
19 Applicant, stating the type of service required and
20 accompanied by any other pertinent information, will be
21 required from each Applicant before service is provided
22 or continued to any Unit. Staff's recommendation is in
23 line with what is currently in the Company's currently
24 effective tariff.

25 Q. Does this conclude your testimony?

26 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Request for an Increase)	
In Annual Water System Operating)	Case No. WR-2017-0343
Revenues for Gascony Water Company, Inc.)	
)	

AFFIDAVIT OF MARK KIESLING

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

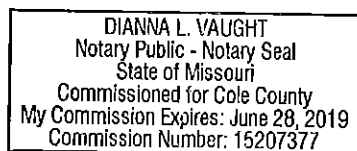
COMES NOW MARK KIESLING, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Rebuttal Testimony, and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MARK KIESLING

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29th day of January, 2018.




Notary Public