Exhibit No.:

Issue: Depreciation
Witness: John A. Robinett
Sponsoring Party: MoPSC Staff

Type of Exhibit: Surrebuttal Testimony

Case No.: GO-2012-0363
Date Testimony Prepared: July 30, 2012

# MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REVIEW DIVISION UTILITY SERVICES DEPARTMENT ENGINEERING & MANAGEMENT SERVICES UNIT

# SURREBUTTAL TESTIMONY

**OF** 

JOHN A. ROBINETT

CASE NO. GO-2012-0363

Jefferson City, Missouri July 2012

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-		SURREBUTTAL TESTIMONY			
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;		JOHN A. ROBINETT			
Ļ		LACLEDE GAS COMPANY			
5		CASE NO. GO-2012-0363			
5	Q.	Please state your name and business address.			
	A.	John A. Robinett, P.O. Box 360, Jefferson City, Missouri 65102.			
	Q.	By whom are you employed and in what capacity?			
	A.	I am a Utility Engineering Specialist in the Engineering and Management			
	Services Unit with the Missouri Public Service Commission (Commission or PSC).				
	Q.	Are you the same John A. Robinett that previously filed Rebuttal Testimony in			
	this proceeding?				
	A.	Yes, I am.			
	Q.	What is the purpose of your Surrebuttal Testimony?			
	A.	The purpose of my surrebuttal testimony is to rebut the Rebuttal Testimony of			
	The Office of	of the Public Counsel's (OPC) witness Mr. Ted Robertson concerning a reasonable			
	depreciation	rate for Laclede's replacement of its core information management system.			
	STAFF RES	<u>SPONSES</u>			
	Q.	Does Staff agree with OPC's characterization of the EIMS?			
	A.	OPC states that the EIMS being installed is "nothing more than a modernization			
	replacement	for current older operating systems" $^{1}$ and that the new systems "provide for			
	basic fundai	mental operating needs of the Company " Staff disagrees because EIMS			
	OPC Witness	Ted Robertson's Rebuttal Testimony, page 11, lines 4-5.			

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replacement of Laclede's current systems is more comparable to the change in technology from an 8-Track tape to a MP3 player. In addition to technological changes, this is a replacement of the core operating system of the Company not replacement of personal computer and employee workstations. The following table illustrates other major differences between the systems.

Function/Feature	Old System	New System
Facility	Onsite	Offsite contracted
Processing	IBM Mainframe	Blade servers
Storage	Tape	Separate redundant systems
Back-up	Tapes shipped out of town	By cable to Dallas
Software	COBOL/ DOS/ proprietary	Integrated systems
Interface	Alphanumeric	Graphical User Interface

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### **FUNCTIONALITY**

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Q. On page 4 of Mr. Robertson's testimony he recommends a five (5) year useful life, and a 20% depreciation rate as both "applicable and appropriate." Do you agree?

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A. No. Personal computers are currently recorded in Accounts 391.1 Data Processing System and 391.3 Data Processing Software that currently have an annual depreciation rate of twenty percent (20%) or a five (5) year service life. Staff's opinion is that the new EIMS will have such a significantly longer service life than personal computers. Based on Staff's review and site visits this year of five enterprise information management systems currently in service or transitioning to new systems, Staff expects an EIMS will have a significantly longer use life than personal computer systems. In addition to site visits, Staff has reviewed the FERC Form 2 for some gas companies throughout the United States looking for approved rates for similar EIMS systems or values associated with account 391. This review

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has supported Staff's opinion of the expected use life of this type of information management system.

- What is the basis for this conclusion? Q.
- A. Unlike off-the-shelf personal computers and software, the EIMS is designed specifically to meet Laclede's information management needs. For example, one component is the asset management. This system is specifically designed for the management of utility assets including work orders related to a particular plant. Another component is data storage and backup. In terms of data storage and back, the EIMS allows Laclede to have multiple backup locations one of which is outside the geographic region.

As the EIMS functionality matures into a system designed for a specific company, there will be updates, but there is less opportunity and reason for entire system replacement. To state it another way, the basic functions required to run the enterprise do not change significantly, however, the analytical, data acquisition, and data storage functions do continue to evolve to specifically meet Laclede's needs.

- O. What are some other functionalities that support the seven percent (7%) depreciation rate recommended by Staff?
- A. There are three very basic or primary areas regarding the functionality of the EIMS. The first is customer billing and accounts. Some of the basic information such as location, contact information, usage and payments are the same for any utility service provider. The EIMS, however, facilitates analytical and tracking tools that the old system cannot. Some examples are automatic meter reading (AMR), distribution metrics, analytics, safety system notifications, and high usage notification. The system may also provide notices and service contact verification that allows a customer to be informed in advance of a service call.

- Q. What is the second core function of the EIMS used to meet the Company's and its customers' needs?
  - A. Asset management and asset information should improve with the EIMS.
  - Q. Why is it important for Laclede to track its assets?
- A. First, a utility needs to know what its assets are and where the assets are located to provide safe and adequate service. It is important for Laclede to know the location of all of its mains and service lines and the EIMS will improve access to this information by having it immediately available through the EIMS system and also having the data backed up remotely.
- Q. What other asset information is important to Laclede providing service to its customers?
- A. Besides information related to its distribution system, EIMS will have information about tools, shop and garage equipment, laboratory equipment, and communications facilities.
  - Q. Why is immediate access to this information important?
- A. These systems and tools are what is necessary to provide the day to day services and safety checks that allow Laclede to operate in a safe and efficient manner. Laboratory equipment and services ensure that the customer is receiving a safe product. Communications ensures that should a problem develop on the system, it can be addressed quickly, while tools, garage and shop equipment ensure that the employees have the adequate resources and where they can be obtained in a timely manner.
- Q. Are there any other core functions that the new EIMS may be capable of performing?
- A. In addition to customer billing and asset management, the EIMS is capable of having payroll and human resources modules that integrate with the core system. The following

A.

Yes.

# BEFORE THE PUBLIC SERVICE COMMISSION

## **OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company's Application to Establish Depreciation Rates for Enterprise Computer Software Systems	
AFFIDAVIT OF JOHN	N A. ROBINETT
STATE OF MISSOURI ) ss.	
COUNTY OF COLE )	
John A. Robinett, of lawful age, on his oar preparation of the foregoing Surrebuttal Test consisting of pages to be presented in foregoing Surrebuttal Testimony were given by set forth in such answers; and that such matter knowledge and belief.	stimony in question and answer form, the above case; that the answers in the him; that he has knowledge of the matters
<u></u>	John G. Robinett  John A. Robinett
Subscribed and sworn to before me this 30H	day of July, 2012.
D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 08, 2012 Commission Number: 08412071	Musellanken Notary Public