

*Exhibit No.:*  
*Issues:* Tank Painting; Capitalized Software;  
Insurance other than Group; Rate  
Case Expense; Amortization of OPEB  
and Pension Assets; Pension and  
OPEBs; Main Breaks; Vehicle  
Leases; Franchise Tax  
*Witness:* Jeremy K. Hagemeyer  
*Sponsoring Party:* MoPSC Staff  
*Type of Exhibit:* Surrebuttal Testimony  
*Case No.:* WR-2007-0216  
*Date Testimony Prepared:* July 31, 2007

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY SERVICES DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**JEREMY K. HAGEMEYER**

**MISSOURI-AMERICAN WATER COMPANY**

**CASE NO. WR-2007-0216**

*Jefferson City, Missouri*  
*July 2007*

*Staff* Exhibit No. 12  
Case No(s) WR-2007-0216  
Date 8-17-07 Rpt RF

STAFF-12

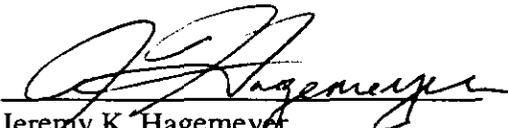
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of Missouri-American Water )  
Company's request for Authority to ) Case No. WR-2007-0216  
Implement a General Rate Increase for )  
Water Service provided in Missouri )  
Service Areas )

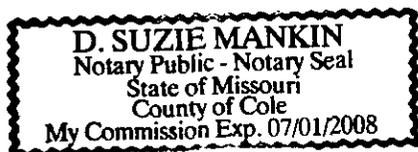
AFFIDAVIT OF JEREMY K. HAGEMEYER

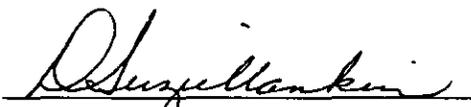
STATE OF MISSOURI     )  
  )     ss.  
COUNTY OF COLE     )

Jeremy K. Hagemeyer, being of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of   6   pages to be presented in the above case; that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Jeremy K. Hagemeyer

Subscribed and sworn to before me this   31st   day of July, 2007.



  
\_\_\_\_\_  
Notary Public

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JEREMY K. HAGEMEYER  
MISSOURI-AMERICAN WATER COMPANY  
CASE NO. WR-2007-0216**

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1    **Tank Painting Expense**

2           Q.     Does Staff agree with the criticism presented by Mr. Petry regarding Staff's  
3 level of tank painting?

4           A.     No. Staff believes that Mr. Petry has ignored the reality of the tank painting  
5 costs actually being incurred by MAWC. He states on page 3, that "[t]he Staff's method  
6 ignores the current condition of the tanks and the work that must be performed to keep those  
7 tanks in working order." However, the past five years of actual experience indicates that less  
8 tank painting expense is required to "be performed to keep those tanks in working order."

9           Q.     Why does the Staff believe this?

10          A.     In its review of the issue, the Staff examined the Company's work paper and  
11 found that, even by their own measurements, the Company had only maintained its schedule  
12 of internal tank painting 48% of the time and external tank painting 35% of the time. Such  
13 performance does not indicate that the Company requires an increased expense level and in  
14 fact, shows that the Staff's method is the appropriate level. Increasing the cost of service for  
15 additional tank painting expense is contrary to the costs actually being incurred.

16    **Capitalized Software Expense**

17          Q.     Has the Staff reassessed its position on capitalized software?

18          A.     Yes. After discussing the matter with the Company, Staff feels that the  
19 portion of software maintenance fees related to customer billing software should not have  
20 been capitalized. This represents \$18,002, of the \$30, 887 identified by Mr. Grubb in his  
21 rebuttal testimony. The remaining software supports all of the functions of the Company:  
22 operations and capital projects. Therefore, the Staff continues to support capitalization of the  
23 remaining software maintenance fees in the amount of \$12,885.

1 **Insurance Other than Group Expense**

2 Q. Have there been any modifications to the Staff's position on Insurance other  
3 than Group?

4 A. Yes. After discussions with the Company, and reading its rebuttal testimony,  
5 the Staff has changed the capitalization rate for the general liability related insurance to  
6 10% from the 43.7% proposed in its direct filing. This change also impacts the brokerage fee  
7 capitalization rate.

8 Q. Does the Staff still oppose including any expenses relating to Kidnap and  
9 Ransom insurance?

10 A. Yes. As stated in direct testimony, Staff continues to believe that the  
11 operations of MAWC would most likely not be materially affected in the unlikely event that  
12 a Company employee were ever kidnapped and held for ransom. Due to this lack of benefit  
13 to MAWC's consumers; the Staff disputes Mr. Grubb's claim that this insurance is a prudent  
14 cost.

15 Q. In his rebuttal testimony, Company witness Edward J. Grubb states that the  
16 current cost of the directors' and officers' insurance policy will be borne by MAWC in the  
17 amount of \$241,744. Has the Staff received any indication that this amount is accurate or  
18 that it represents an expense currently being incurred by MAWC?

19 A. No. To the contrary, the Company is currently covered under a global policy  
20 procured by RWE and this coverage will remain in place well beyond the true up period.  
21 American Water Company has procured additional coverage and the Staff has received  
22 invoices from the Company that would indicate that the amount related to this insurance is  
23 approximately \$7,000. This amount has been added to the Staff's cost of service.

1 **Rate Case Expense**

2 Q. What is the Staff's position on rate case expense?

3 A. The Staff's position has not changed. Barring evidence to the contrary, Staff's  
4 normal position on rate case expense is to normalize the actual amount over three years.  
5 Keeping this in mind, the Staff's normalized level of expense proposed in the direct filing,  
6 \$147,256, represents only a third of a total of \$441,768 in rate case expense. The Company  
7 has not provided detailed invoices that exceed this amount; therefore the Staff feels that there  
8 is no need to change from its direct filed position on this issue. The Staff is open to  
9 considering changing its annual expense amount based on prudent, supported increases in the  
10 costs of the current rate case.

11 **Amortization of OPEB and Pension Assets**

12 Q. Has the Staff reviewed Company witness Edward J. Grubb's testimony  
13 regarding the amortization of OPEB and Pension Assets?

14 A. Yes. The Staff has reviewed this testimony and has made a change in the  
15 OPEB expense to include \$31,901 for the amortization of the MAWC Financial Accounting  
16 Standard (FAS) 106 deferred costs. The Staff is able to justify this amount based on the  
17 Commission's Order in Case No. WR-95-205.

18 Q. Does the Staff agree that there should be an increase in this amount to the  
19 level proposed by Missouri-American?

20 A. No. Staff has not found support for the remainder of the Company-proposed  
21 amortization expense in past Commission orders or approved Stipulation and Agreements.

1 | **Pension and OPEB Expenses**

2 | Q. Are Staff's calculations of pension and OPEB expenses consistent with the  
3 | Financial Accounting Standards Board Statements 87 and 106, respectively?

4 | A. Yes. Although Mr. Grubb opposes Staff's approach, as stated in my direct  
5 | testimony, the "corridor" defined in these statements specifies the minimum amortization of  
6 | unrecognized gains and losses. Paragraphs 33 and 60 from FAS 87 and 106, respectively,  
7 | allow for different approaches for amortizing unrecognized gains and losses. Due to this  
8 | allowance, the Staff's approach for dealing with pensions and OPEBs is consistent with  
9 | Statements 87 and 106.

10 | Q. If the approach utilized by the Company is to utilize the minimum  
11 | amortization for unrecognized gains and losses, isn't it possible that the amortization period  
12 | could be longer than what the Staff is currently proposing?

13 | A. Yes, and in fact the amortization periods for unrecognized gains and losses are  
14 | longer than the ten years proposed by the Staff. As stated in the Staff's direct testimony, it is  
15 | important to recognize costs and benefits in rates in a timely manner. The delayed  
16 | recognition resulting from the corridor approach and an amortization longer than 10 years  
17 | does not accomplish this goal.

18 | Q. Does the tracker proposed by the Staff add a significant burden in monitoring  
19 | pension and OPEB expenses?

20 | A. No. The information utilized in the calculation of Staff's tracker proposal  
21 | already should be collected. The tracker only monitors the ongoing difference between the  
22 | actuarially calculated FAS 87 and 106 levels and the amount included in rates from this case.

1 | **Main Break Expense**

2 | Q. Has the Staff made any changes to its main breaks expense?

3 | A. Yes. The Staff recently received information regarding the main break cost  
4 | through May 31, 2007. After reviewing this information the Staff believes that the  
5 | Company's proposed annual cost of \$2,100,046 is appropriate.

6 | **Vehicle Lease Expense**

7 | Q. Has the Staff revised its direct testimony position regarding the adjustment to  
8 | vehicle leases?

9 | A. Yes. The Staff has changed its position to reflect the correction suggested by  
10 | Mr. Thakadiyil related to vehicle leases. There is now no difference between the Company  
11 | and the Staff on this issue.

12 | **Franchise Tax**

13 | Q. Do you agree with Company witness Peter J. Thakadiyil's testimony  
14 | proposing \$41,958 adjustment to increase franchise tax expense.

15 | A. Staff has reviewed and accepts the Company's proposed \$41,958 increase in  
16 | Franchise tax expense.

17 | Q. Does this conclude your surrebuttal testimony?

18 | A. Yes, it does.