FILED March 22, 2018 Data Center Missouri Public Service Commission

128

Exhibit No. 128 Date 315/13 Reporter MA File No. WR-2017-0285

Exhibit No.: Issue: Witness: Sponsoring Party: Type of Exhibit: Case No.: Date Testimony Prepared:

Depreciation Rates Keenan B. Patterson, PE MoPSC Staff Surrebuttal Testimony WR-2017-0285 February 9, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

OPERATIONAL ANALYSIS DEPARTMENT

SURREBUTTAL TESTIMONY

OF

KEENAN B. PATTERSON, PE

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WR-2017-0285

Jefferson City, Missouri February 2018

1		SURREBUTTAL TESTIMONY				
2	OF					
3	KEENAN B. PATTERSON, PE					
4		MISSOURI-AMERICAN WATER COMPANY				
5		CASE NO. WR-2017-0285				
6	Q.	Please state your name and business address.				
7	А.	My name is Keenan B. Patterson. My business address is Missouri Public				
8	Service Commission ("Commission"), P.O. Box 360, Jefferson City, Missouri 65102.					
9	Q.	What is your position at the Commission?				
10	А.	I am a Utility Regulatory Engineer in the Engineering Analysis Unit,				
11	Operational Analysis Department, Commission Staff Division.					
12	Q.	Are you the same Keenan B. Patterson that filed direct testimony as part of the				
13	Staff's Cost of Service Report in this case on November 30, 2017 and Rebuttal Testimony on					
14	January 17, 2018?					
15	Α.	Yes.				
16	Q.	What is the purpose of your Surrebuttal Testimony?				
17	А.	The purpose of my Surrebuttal Testimony is to address depreciation				
18	rate-related requests appearing in the Rebuttal Testimony of Office of the Public Counsel					
19	("OPC") witness Mr. John A. Robinett and Missouri-American Water Company (MAWC)					
20	witness Mr. Brian W. LaGrand.					
21	Q.	What depreciation rate-related requests were made by OPC?				
22	А.	OPC requested the assignment of a depreciation rate of 5 percent to sewer				
23	Account No.	390.9-Structures and Improvements-Leasehold. OPC also requested that the				

Surrebuttal Testimony of Keenan B. Patterson, PE

Commission require MAWC to submit the report of an independent audit to determine the
 sources and practices that led to negative depreciation reserves.

Q. Does Staff agree with OPC's request to add a depreciation rate of 5 percent for
sewer Account No. 390.9?

A. Staff has no objection to this request. A depreciation rate of 0 percent was
assigned to this account in Case No. WR-2015-0301 because there was no plant in the
account at that time. Since then, MAWC has added plant to this account. MAWC witness
Mr. LaGrand also agreed to this change in his Rebuttal Testimony.

Staff recommends that the Commission order MAWC to use the sewer depreciation
rates shown in Schedule KBP-s1. This schedule adds the 5 percent deprecation rate to
Account No. 390.9, but it is otherwise the same as the depreciation rate schedule approved by
the Commission in Case No. WR-2015-0301. Staff recommends that the Commission order
MAWC to continue to use the water depreciation rates ordered in Case No. WR-2015-0301
for all other accounts.

Q. Does Staff agree that MAWC should be ordered to submit the report of an
external independent audit that addresses negative depreciation reserves as described by
OPC?

A. Staff has no objection to such an audit and report. Staff recommends that such a report be submitted as part of or in conjunction with the next depreciation study. In addition, Staff recommends that the commission order MAWC to report on the potential plant, depreciation reserve and depreciation rate impacts of its transition from automated meter reading (AMR) to automated metering infrastructure (AMI) in addition to the sources of negative depreciation reserves. Staff recommends that the Commission order MAWC to Surrebuttal Testimony of Keenan B. Patterson, PE

.

1	propose methods to address these issues, including adjustments to deprecation reserves and						
2	depreciation rates, and incorporate these proposals into its next depreciation study.						
3	Q.	Q. What depreciation rate-related requests were made by MAWC?					
4	А.	MAWC reiterated its request to change the depreciation rate for Account No.					
5	391.4—BT Initial Investment from 5 percent to 14.3 percent.						
6	Q.	Does Staff agree with MAWC's request to change the depreciation rate for					
7	Account No. 391.4?						
8	A.	No. Staff's reasons for disagreeing with this request are described in my					
9	Rebuttal Testimony. Staff recommends that the Commission order MAWC to use the sewer						
10	depreciation rates appearing in Schedule KBP-s1 and to continue to use the water depreciation						
11	rates ordered in WR-2015-0301.						
12	Q.	Does this complete your Surrebuttal Testimony?					
13	А.	Yes.					

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

)

)

)

)

In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas

Case No. WR-2017-0285

AFFIDAVIT OF KEENAN B. PATTERSON, PE

STATE OF MISSOURI

SS,

COMES NOW KEENAN B. PATTERSON, PE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

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 $\underline{844}$ day of February, 2018.

ſ	D. SUZIE MANKIN
	Malany Dublic - NOIALY 564
	State of Missouri
	Commission Expires: December 12, 2020 My Commission Expires: December 12, 2020
	My Commission Expires: December 12, Ecco Commission Number: 12412070
	COMPLEX STOR COMPLEX

Notacy Public

MISSOURI-AMERICAN WATER COMPANY- Sewer SCHEDULE of DEPRECIATION RATES DIVISIONS: All WR-2017-0285

NARUC ACCOUNT	ACCOUNT DESCRIPTION	% Remaining Life	AVERAGE SERVICE LIFE	IOWA	% NET
NUMBER	-	DEPRECIATION	(YEARS)	Curves	SALVAGE
	-				-
	COLLECTION PLANT				
351	Structures & Improvements	2.03%	50	R3	-5%
352.1	Collection Sewers (Force)	1.64%	60	R2.5	-10%
352.2	Collection Sewers (Gravity)	1.58%	70	R3	-20%
353	Services To Customers	2.87%	55	R2.0	-40%
354	Flow Measuring Devices	3.38%	25	S2.5	0%
356	Other Collection Equipment	3.15%	50		0%
357	Communication Equipment	6.67%	15	SQ	0%
	PUMPING PLANT				
361	Structures & Improvements	2.17%	45	R3	0%
362	Receiving Wells	2.87%	45 30	L2,5	0%
363	Electric Pumping Equip, (Includes Generators)	4.31%	30 15	L2.5 L1.5	-5%
364	Diesel Pumping Equipment	4.31%	15	L1.5 L1.5	-5%
365	Other Pumping Equipment	4.31%	15	L1.5	-5%
	- ····· -·····························			2110	0,0
	TREATMENT & DISPOSAL PLANT				
371	Structures & Improvements Treatment & Disposal Equipment,	1.43%	60	R2.5	-5%
372	(Includes pumps, blowers, generators)	3.97%	30	S0.5	-20%
373	Plant Sewers	1.60%	50	R2.5	0%
374	Outfall Sewer Lines	3.04%	35	L2.0	0%
	GENERAL PLANT				
390.0	Structures & Improve - General	3.11%	35	R2.5	-5%
390.0					
390.9 391.0	Structures & Improve - Leasehold Office Furniture	5.00% 5.00%	20 20	R4	0% 0%
391.0	Computer & Peripherial Equipment	20.00%	5	SQ SQ	0%
391.2	Computer Hardware & Software	20.00%	5	SQ	0%
391.25	Computer Naturale & Software	5.00%	20	SQ	0%
391.25	Personal Computer Software	10.00%	10	SQ	0%
391.20	Other Office Equipment	6.67%	15	30	0%
391.4	BTS Initial Investment	5.00%	20		0%
392.0	WW Transortation Eulpment	3.45%	10	L2.5	5%
392.1	Transportation Equipment - Light trucks	3.45%	10	L2.5	5%
392.2	Transportation Equipment - Heavy trucks	3.45%	10	L2.5	5%
392.3	Transportation Equipment - Autos	3.45%	10	L2.5	5%
392.4	Transportation Equipment - Other	3.45%	10	L2.5	5%
393.0	Stores Equipment	4.00%	25	SQ	0%
394.0	Tools, Shop, Garage Equipment	5.00%	20	SQ	0%
395.0	Laboratory Equipment	6.67%	15	SQ	0%
396.0	Power Operated Equipment	7.71%	15	L2.5	0%
397.1	Communication Equip - Non Telephone	6.67%	15	SQ	0%
397.2	Communication Equip - Telephone	6.67%	15	SQ	0%
398.0	Miscellaneous Equip	6.43%	15	SQ	0%
399.0	Other Tangible Equipment	0.00%	30	R2.0	0%

Schedule KBP-s1