

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 09-0319 ON REMAND

IAWC EXHIBIT NO. 1.00R-RM

**REBUTTAL TESTIMONY OF
RICH KERCKHOVE**

ILLINOIS-AMERICAN WATER COMPANY

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OF
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1 **I. WITNESS INTRODUCTION**

2 **Q. Please state your name.**

3 **A.** Rich Kerckhove.

4 **Q. Are you the same Rich Kerckhove who previously filed testimony in this**
5 **proceeding?**

6 **A.** Yes, I am.

7 **II. PURPOSE OF REBUTTAL TESTIMONY**

8 **Q. What is the purpose of your rebuttal testimony?**

9 **A.** The purpose of my rebuttal testimony is to respond to the direct testimony of
10 Staff witnesses Mike Ostrander, Sheena Kight-Garlich and Christopher Boggs,
11 and to propose entry into evidence of additional documentation in support of rate
12 case expense.

13 **III. RESPONSE TO STAFF WITNESSES**

14 **Q. Have you reviewed the direct testimony of Staff witnesses Mr. Ostrander,**
15 **Ms. Kight-Garlich and Mr. Boggs filed in this remand proceeding?**

16 **A.** Yes. Taken together, they recommend, as stated by Mr. Ostrander, that the
17 Commission find that the "amounts included as rate case expenses in the
18 revenue requirement of \$2.339 million for Illinois-American are just and
19 reasonable."

20 **Q. Do you agree that this conclusion is appropriate?**

21 **A.** Yes.

22 **Q. Does Staff make any other recommendations?**

23 **A.** Yes. Staff recommends a disallowance of \$151 for certain meals, on the
24 grounds that such expenses are "not incidental to the preparation and litigation of
25 a rate case...." However, because the amount is immaterial, it does not impact
26 Staff's recommendation as set forth above. Staff also recommends that certain
27 items be addressed in the Commission's order.

28 **Q. Do you have any comments on these recommendations?**

29 **A.** With regard to the meals adjustment, IAWC does not contest the adjustment for
30 the purposes of this case, due to its immateriality. Regarding the items to be
31 addressed in the order, I agree with Mr. Ostrander that the referenced items
32 should be addressed, and I agree with the concluding language he proposes.

33 **Q. Is IAWC proposing entry into evidence of any other documentation in**
34 **support of rate case expense?**

35 **A.** Yes. I have attached to my testimony IAWC's responses to the JMO 2, JMO 3
36 and CB 8 series of data requests from Staff, issued as part of this remand
37 proceeding, as IAWC Ex. 1.01R-RM. IAWC recommends that, for the sake of the
38 completeness of the record, these data responses be entered into the evidentiary
39 record.

40 **Q. Does this conclude your rebuttal testimony?**

41 **A.** Yes.