

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

In the Matter of the Petition of	)	
Missouri-American Water Company for	)	<b>File Nos. <u>WO-2021-0428</u></b>
Approval to Establish a Water and Sewer	)	<b><u>SO-2021-0429</u></b>
Infrastructure Rate Adjustment ("WSIRA")	)	

**MOTION FOR LEAVE TO AMEND PETITION  
AND AMENDMENT TO PETITION**

COMES NOW Missouri-American Water Company ("MAWC"), by and through the undersigned counsel, and pursuant to 20 CSR 4240-2.080(18), files this *Motion for Leave to Amend Petition and Amendment to Petition*. In support, MAWC states as follows to the Missouri Public Service Commission ("Commission"):

**BACKGROUND INFORMATION**

1. On September 3, 2021, MAWC filed a *Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice* ("Petition") with the Commission. MAWC seeks to establish a Water and Sewer Infrastructure Rate Adjustment ("WSIRA") to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The Commission assigned File Nos. WO-2021-0428 and SO-2021-0429 to the *Petition*.

2. Through recent conversations between MAWC, the Staff of the Public Service Commission ("Staff") and the Office of the Public Counsel, MAWC has become aware of some confusion centered around paragraph 10 of the *Petition* and whether MAWC intends to collect or "roll into" the WSIRA the infrastructure system replacement surcharge ("ISRS") that is the subject of Case No. WO-2021-0343 now pending before the Commission.

### **MOTION FOR LEAVE**

3. Commission Rule 20 CSR 4240-2.080(18) provides, in part, that a pleading may be amended at any time by leave of the Commission. No responsive pleading has yet been filed in this matter. Staff has been ordered to file a recommendation by December 2, 2021. MAWC believes that a grant of the requested leave will not prejudice the parties and will aid in the efficient processing of this *Petition*.

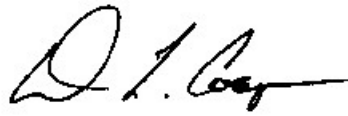
### **AMENDMENT TO THE PETITION**

4. Paragraph 10 of the *Petition* currently includes the following sentence: “The proposed WSIRA revenues also include the investments included in the pending Infrastructure System Replacement Surcharge (ISRS) case, in accordance with Section 393.1506.” To clarify MAWC’s request and avoid any confusion, MAWC seeks to amend Paragraph 10 to read as follows:

The proposed WSIRA revenues also include the investments included in the pending Infrastructure System Replacement Surcharge (ISRS) case that also qualify under the WSIRA. However, the *Petition* is based on proving up WSIRA qualifying plant without regard to the current ISRS and, as indicated in Paragraph 22, MAWC intends to make a tariff filing to eliminate any existing ISRS prior to any WSIRA becoming effective.

**WHEREFORE**, MAWC requests the Commission issue an order granting MAWC’S motion for leave to amend its *Petition* and consider the *Petition* amended as stated herein.

Respectfully submitted,



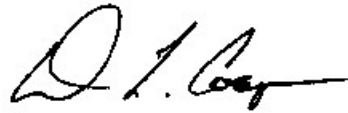
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**ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record this 17<sup>th</sup> day of September 2021.



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