

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

In the Matter of Missouri-American Water Company's)
Request for Authority to Implement a General Rate) Case No. WR-2015-0301
Increase for Water and Sewer Service Provided in)
Missouri Service Areas)

CITY OF BRUNSWICK'S STATEMENT OF POSITION ON THE ISSUES

The City of Brunswick, Missouri, (City) states the following for its Statement of Position for the identified issues:

31. District Consolidation/Consolidated Pricing

Should the Commission adopt the consolidation of districts proposed by Staff, the alternative consolidation proposed by MAWC, or maintain the status quo as proposed by OPC?

The City is not opposed the consolidation of the districts proposed by MAWC. The City is opposed to the consolidation of the districts proposed by Staff. Their consolidation would impose the bulk of the revenue requirement for the proposed District 2 on the City. The City already has rates in the 40% quartile based on Appendix B of MAWC's Transmittal Letter filed on July 31, 2015. This revenue requirement would be a significant burden on the approximately 350 MAWC customers in the City.

32. Rate Design & Customer Charge

The City of Brunswick supports a rate design using one of the following scenarios:

1. The increase in MAWC's revenue requirement is evenly distributed across all customers so that all customers experience the same percentage rate increase; or
2. The City experiences a rate decrease equal or exceeding the -7.47% average for Staff's proposed District 2.

The City of Brunswick has no position at this time on the other issues of this case.

Respectfully submitted,

/s/ Gary Drag

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CERTIFICATE OF SERVICE

I certify that true and accurate copies of this Motion were sent by e-mail on March 11, 2016, to all parties on the official service list for this case.

/s/ Gary Drag

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Attorney for the City of Brunswick, Missouri