

Missouri Public Service Commission

MAIDA J. COLEMAN Commissioner SCOTT T. RUPP Chairman

JASON R. HOLSMAN Commissioner

VACANT Commissioner POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://psc.mo.gov

GLEN KOLKMEYER
Commissioner

February 3, 2023

Lindsay VanGerpen Office of the Public Counsel 200 Madison St., 6th Floor Jefferson City, MO 65101 Lindsay.VanGerpen@opc.mo.gov

RE: 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. WR-2022-0303

Dear Ms. VanGerpen:

In accordance with 20 CSR 4240-2.090(2)(D) and the procedural schedule in this case, the Staff of the Missouri Public Service Commission notifies Public Counsel of Staff's objections to the following DRs:

DR 323. Has Staff performed any studies of the impact of Missouri American Water Company's current line extension policy on current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories, and because it calls for a legal conclusion. Without waiving these objections, Staff states that it has not performed any studies of the impact of MAWC's current line extension policy on current customers. However, Staff used MAWC's data in response to Staff's

DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the attached Excel file.

DR 324: Has Staff performed any analysis to determine if the current line extension policy is cost effective for current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories, and because it calls for a legal conclusion. Furthermore, the phrase "cost effective" is vague. Without waiving these objections, Staff states that it used MAWC's data in response to Staff's DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the Excel file attached to Staff's response to OPC DR 323.

DR 325: Has Staff performed any studies of the impact of MAWC's proposed line extension policy on current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories, and because it calls for a legal conclusion. Without waiving these objections, Staff states that it has not performed any studies of the impact of MAWC's proposed line extension policy on current customers. However, Staff used MAWC's data in response to Staff's DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the Excel file attached to Staff's response to OPC DR 323.

DR 326: Has Staff performed any analysis to determine if MAWC's proposed line extension policy is cost effective for current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories, and because it calls for a legal conclusion. Furthermore, the phrase "cost effective" is vague. Without waiving these objections, Staff states that it used MAWC's data in response to Staff's DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the Excel file attached to Staff's response to OPC DR 323.

DR 327: Has Staff performed any studies of the impact of Staff's proposed line extension policy on current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories,

and because it calls for a legal conclusion. Without waiving these objections, Staff states that it has not performed any studies of the impact of Staff's proposed line extension policy on current customers. However, Staff used MAWC's data in response to Staff's DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the Excel file attached to Staff's response to OPC DR 323.

DR 328: Has Staff performed any analysis to determine if its own proposed line extension policy is cost effective for current customers? (a) If so, please provide this study. (b) If not, please explain why Staff has not done so.

Objection: Staff objects to this DR because it calls for privileged work product, consisting of attorney mental impressions, conclusions, opinions, and/or legal theories, and because it calls for a legal conclusion. Furthermore, the phrase "cost effective" is vague. Without waiving these objections, Staff states that it used MAWC's data in response to Staff's DR 264 and Schedule JTK-1, attached to Jeff Kaiser's direct testimony, to prepare the Excel file attached to Staff's response to OPC DR 323.

Please let me know if you have questions.

Very truly yours,
/s/ Karen E. Bretz
Karen E. Bretz
Deputy Counsel
Karen.Bretz@psc.mo.gov

cc. Counsel for all other parties and OPC.

Street Grayshore Far Gray G	District	Subdivsion	WBS		otal Cost of evelopment	Total No	4 Times Revenue	MAW Contribution based on 4 x Rev (If credit all lots in subdivsion)	MAW % of Total Cost (If credit all lots in subdivision)						Total Homes Built	Actual Cost Paid by MAWC vs 5 Year Projected Payback	Actual MAWC Percent of Total Paid	Total Cost times .35 MAWC Proposal	Total Cost times .25 Staff Proposal
withing file of the control of the c								•		2021	2020	2019	2018	2017		•		•	•
Part	St Joseph	Greystone II Part 2	D17-0301-P-0132	\$	60,879.26	2	\$1,709.88			0		0	1	0	1	\$ 8,523.10	14.00%	\$ 21,307.74	\$ 15,219.82
Second Second Part										\$0.00	\$0.00	0	\$1,709.88	\$0.00					
Column C	Parkville	Cider Mill 6th Plat	D17-0401-P-0072	\$	114,339.01	20	\$1,709.88	\$34,197.60	29.91%				2	5	10		14.00%	\$ 40,018.6	5 \$ 28,584.75
Third Thir		Catawaada Faurth Diat	D17 0401 D 0073	ć	114 572 06	26	ć1 700 00	¢C1 FFF C0	F2 720/	-	\$5,129.64	•		\$8,549.40	25		14.000/	ć 40.100.3°	20.642.02
The control of the		Galewoods Fourth Plat	D17-0401-P-0073	Þ	114,572.06	30	\$1,709.88	\$61,555.68	53./3%		1 \$1.700.88			3 \$5 120 6 <i>1</i>	35		14.00%	\$ 40,100.2	2 \$ 28,643.02
State Bulles stand color 17-000-Perils		Thousand Oaks 20th Plat	D17-0401-P-0074	\$	151.480.68	32	\$1,709,88	\$54.716.16	36.12%	33,413.70	31,703.88	5	6	35,125.04	19		14.00%	\$ 53.018.24	4 \$ 37.870.17
Machemerican Direction Properties Direction Directio				•	,		7-7 , 22, 22	75 1,1 = 5.25	20.22.	\$3,419.76	\$5,129.64	8549.4	\$10,259.28	\$5,129.64				, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	7 01,010.0.
March Marc	St Charles	Bluffs at Wind Castle	D17-0901-P-0118	\$	210,049.05	40	\$2,283.16	\$91,326.40	43.48%	3	9	7			37		5.00%	\$ 73,517.1	7 \$ 52,512.26
Markingor M7 Loss DL7-001-F-0116 S 36,284.3 S 2,281.5 S 9,112-64 C 1 S										\$6,849.48	\$20,548.44	15982.1	\$22,831.60	\$18,265.28					
Secon Englane Pages Page		MacArthur Park	D17-0901-P-0115	\$	37,451.98	10	\$2,283.16	\$22,831.60	60.96%	2		1	5	1	9		5.00%	\$ 13,108.19	9 \$ 9,363.00
Part		\A/le:t	D47 0004 D 0446		26.264.22	4	ća 202.4 <i>C</i>	60.422.64	25.400/	\$4,566.32	\$0.00	_	\$11,415.80	\$2,283.16	2		F 000/	ć 42.602.F	0.055.00
March Marc		Whitmoor M/ Lots	D17-0901-P-0116	\$	36,264.33	4	\$2,283.16	\$9,132.64	25.18%	2 202 16	1 \$2,202.16		¢0.00	¢0.00	2		5.00%	\$ 12,692.5.	2 \$ 9,066.08
Popular Popu	Jaxson Estates	Jaxson Estates Ph 2	D17-4201-P-0001	Ś	134.556.27	44	\$2,283,16	\$100.459.04	74.66%	. ,		6			38		6.50%	\$ 47.094.69	9 \$ 33.639.07
Popular Popu			220 000.	*			Ψ2)200.20	Ψ=00, 10010 1	,			13699		_	30		0.0070	φ,σσσ.	φ σο,σσσ.σ.
Buchshame Direction Dire	Joplin	Twin Hills Phase 1	D17-1101-P-0294	\$	38,117.45	8	\$1,633.56	\$13,068.48	34.28%			4	0		4		14.00%	\$ 13,341.1	1 \$ 9,529.36
Status Piper Glee										\$0.00	\$0.00	6534.24	\$0.00	\$0.00		\$6,534.24			
Page Claim Pag		Buchanan Place Phase 1	D17-1101-P-0304	\$	22,797.54	5	\$1,633.56	\$8,167.80	35.83%						4		24.87%	\$ 7,979.14	1 \$ 5,699.39
Stool Harmony Seven D1/2021-P-0944 Stool Sto		Din ou Clare	D47 4404 D 0207	.	110.052.40	40	ć4 C22 EC	ACE 242.40	FF 250/	_		•			40		4.4.000/	44 340 3	
StLow Hermony Sevene 17,070 17		Piper Gien	D17-1101-P-0307	\$	118,052.40	40	\$1,633.56	\$65,342.40	55.35%						40		14.00%	\$ 41,318.3	\$ 29,513.10
St Louis Arbors at Keffer Creek D17-0201-P-0995 \$ 48,388.5 \$ 7	St Louis	Harmony Seven	D17-0201-P-0944	Ś	113.224.25	6	\$1.848.88	\$11,093,28	9.80%	-		_	0.10		6		13.20%	\$ 39.628.49	9 \$ 28.306.06
A thors at Kiefer Creek 10 70 70 70 70 70 70 70	30 20013	riaring ny seven	517 6161 1 65 1 1	*	110,2220	·	ψ1,0 10.00	Ψ11,033.20	3.0070	_			\$0.00		Ü		13.2070	φ 33,020. II	20,300.00
Studie Arbor's at Willmas Farm D17-0201-P-0964 \$ 33,747-05 \$ 1,848.88 \$68,897.36 \$ 1,548.88 \$68,897.36 \$ 1,593.88 \$1,585.66.66 \$1,193.28 \$73,732 \$38,885.68 \$3,5897.36 \$5,685.73 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,683.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$0,000 \$1,825.67 \$1,693.00 \$1,693.00 \$1,693.00 \$1,825.67 \$1,693.00 \$1,825.67 \$1,693.00 \$1,825.67 \$1,825.60 \$	St Louis	Arbors at Kiefer Creek	D17-0201-P-0952	\$	48,398.55	17	\$1,848.88	\$31,430.96	64.94%	1	2	3	6	5	17		5.00%	\$ 16,939.49	9 \$ 12,099.64
St Louis Laure Oak Manor D17-0201-P-0964 \$ 33,787.63 8 \$ 1,848.88										\$1,848.88	\$3,697.76	5546.64	\$11,093.28	\$9,244.40					
St Louis Laure Oak Manor D17-0201-P-0964 \$13,878.63 \$8 \$1,848.88 \$14,791.04 \$4,781.84 \$1 \$1 \$2 \$3 \$1 \$8 \$1,689.38 \$16,903.85 \$1,825.67 \$8,846.91 \$1,848.88 \$1,8	St Louis	Arbors at Wilmas Farm	D17-0201-P-0949	\$	332,740.25	47	\$1,848.88	\$86,897.36	26.12%	3	6			2	47		5.00%	\$ 116,459.09	9 \$ 83,185.06
StLouis Maryland Qaks D17-0201-P-0970 \$ 280,183.11 102 \$1,848.88 \$188,585.76 67.311% 5 5 7 7 71 14 109.5 \$1,009.5 \$5,006.09 \$1,009.5 \$1	Ch I avvia	Laural Oak Manar	D17 0201 D 0064	¢	22 707 62	0	ć1 040 00	¢14.704.04	42.700/	\$5,546.64	\$11,093.28	27733.2	_	\$3,697.76	0		F 000/	ć 11.02F.C	7 6 0.446.01
St Louis Maryland Oaks 017-0201-P-0970 \$ 280,183.11 10 \$ 1,848.88 \$188,585.76 \$ 67.31% \$ 5 \$ 7 \$ 71 \$ 14 \$ 102 \$ \$1,409.16 \$0.00% \$ 98,064.09 \$ 70,045.78 \$15,000% \$10.00% \$10	St Louis	Laurei Oak Manor	D17-0201-P-0964	Ş	33,/8/.03	8	\$1,848.88	\$14,791.04	43./8%	1 \$1.949.99	1 \$1.9/9.99	2 3607.76		1 2/2 22	8		5.00%	\$ 11,825.6	7 \$ 8,446.91
Statistic Stat	St Louis	Maryland Oaks	D17-0201-P-0970	\$	280,183.11	102	\$1.848.88	\$188.585.76	67.31%			7			102		5.00%	\$ 98.064.09	9 \$ 70.045.78
St Louis Rich Keen Court D17-0201-P-0974 \$ 44,502.04 18 \$1,848.88 \$33,279.84 74,78% 0 2 6 10 0 0 18 \$2,225.10 \$50,00 \$33,279.84 \$1,1025.11 \$1,1025.		•					, -, -, - · · · · · ·	, ,				12942.2						, co, co	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
St Louis Rich Keen Court D17-0201-P-0974 \$ 44,502.04 18 \$1,848.88 \$33,279.84 74.78% 0 2 6 10 0 18 \$3,279.84 5.00% \$1,125.51	St Louis	Stonemill	D17-0201-P-0972	\$	51,549.62	12	\$1,848.88	\$22,186.56	43.04%	0	0	1	6	5	12	\$ 2,577.48	5.00%	\$ 18,042.3	7 \$ 12,887.41
St Louis Residence Jennings PI Ph 2 D17-0201-P-0965 \$ 94,784.64 2 \$ 1,848.88 \$ 3,697.76 \$ 3,997.66 \$ 0 0 0 0 0 0 0 0 0										\$0.00	\$0.00	1848.88	\$11,093.28	\$9,244.40					
St Louis Residence Jennings PI Ph 2 D17-0201-P-0965 \$ 94,784.64 2 \$1,848.85 \$3,697.76 \$3.99% 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	St Louis	Rich Keen Court	D17-0201-P-0974	\$	44,502.04	18	\$1,848.88	\$33,279.84	74.78%		2	6			18		5.00%	\$ 15,575.7	1 \$ 11,125.51
St Louis Warwick on White Road D17-0201-P-0969 \$ 114,274.05 10 \$1,848.88 \$18,488.80 16.18% 1 1 1 3 5 0 0 0 \$3,697.76 \$14,888.80 \$18,488.	S+ Louis	Posidoneo Jonnings DI Dh 2	D17 0201 D 0065	ć	04 794 64	2	¢1 010 00	¢2 607 76	2 00%	-			_		2		E 00%	¢ 22.174.6	22 606 16
St Louis Hartford Glen D17-0201-P-0969 \$ 114,274.05 10 \$1,848.88 \$18,488.80 16.18 1 1 3 5 0 0 10 \$5,713.70 5.00 \$ 39,995.92 \$ 28,568.51	St Louis	Residence Jennings FI FII 2	D17-0201-P-0903	Ş	34,764.04	2	\$1,040.00	\$3,037.70	3.50%						2		3.00%	3 33,174.0	2 3 23,030.10
St Louis Hartford Glen D17-0201-P-0973 \$ 141,854.80 32 \$1,848.88 \$59,164.16 41.71% 2 8 9 6 7 32 \$ 21,022.88 14.82% \$ 49,649.18 \$ 35,463.70 \$ 35,463.70 \$ 35,463.70 \$ 36,5776 \$ 36,	St Louis	Warwick on White Road	D17-0201-P-0969	\$	114,274.05	10	\$1,848.88	\$18,488.80	16.18%	1	1				10		5.00%	\$ 39,995.92	2 \$ 28,568.51
St Louis										\$1,848.88	\$1,848.88	5546.64	\$9,244.40	\$0.00					
St Louis	St Louis	Hartford Glen	D17-0201-P-0973	\$	141,854.80	32	\$1,848.88	\$59,164.16	41.71%	2	8	9	6	7	32	\$ 21,022.88	14.82%	\$ 49,649.13	3 \$ 35,463.70
St Louis Main Street Crossing Ph 1 D17-0201-P-0978 \$ 131,972.71 23 \$1,848.88 \$42,524.24 32.2% 4 2 2 8 7 23 \$ 6,598.64 5.00% \$ 46,190.45 \$ 32,993.18 \$ 151,091.04 \$10,000 \$10,0			D.17.0004 D.0000				4			\$3,697.76	\$14,791.04	16639.9	\$11,093.28	\$12,942.16					
St Louis Main Street Crossing Ph 1 D17-0201-P-0978 \$ 131,972.71 23 \$1,848.88 \$42,524.24 32.2% 4 2 2 8 7 23 \$ 6,598.64 \$5.00% \$ 46,190.45 \$ 32,993.18 \$10.00 \$1.00	St Louis	Oak Ridge Place Phase 2	D17-0201-P-0960	\$	47,381.57	15	\$1,848.88	\$27,733.20	58.53%	2	3	3	5		13		5.00%	\$ 16,583.5	5 \$ 11,845.39
St Louis Wildhorse Ridge D17-0201-P-0943 \$ 42,325.54 7 \$1,848.88 \$12,942.16 30.58% 0 0 0 3 4 0 7 \$ 2,116.28 5.00% \$ 14,813.94 \$ 10,581.39 St Louis Main Street Crossing Ph 2 D17-0201-P-0994 \$ 179,173.88 13 \$1,848.88 \$24,035.44 13.41% 2 2 2 4 3 13 \$ 8,958.69 5.00% \$ 62,710.86 \$ 44,793.47 \$1,656,152.64 \$53 \$1,041,068.12 62.86% 45 59 120 213 72 509 \$ 218,268.06 \$ 943,149.43 \$ 673,678.17	St Louis	Main Street Crossing Ph 1	D17-0201-P-0978	\$	131 972 71	23	\$1 848 88	\$42 524 24	32 22%	\$3,697.76	\$5,546.64	5546.64	\$9,244.40 8	\$0.00 7	23		5.00%	\$ 46 190 4	5 \$ 32,993,18
St Louis Wildhorse Ridge D17-0201-P-0943 \$ 42,325.54 7 \$1,848.88 \$12,942.16 30.58% 0 0 0 3 4 0 0 7 \$ 2,116.28 5.00% \$ 14,813.94 \$ 10,581.39 \$ 10,581.3	3t L0013	2 55. 5. 550mig 1 11 1	02011 0010	Y	131,372.71	23	γ±,0π0.00	Y72,J27.27	J2.22/0	\$7.395.52	\$3.697.76	3697.76	\$14.791.04	\$12.942.16	23		5.0070	→ →0,±30.4.	, , 32,333.10
St Louis Main Street Crossing Ph 2 D17-0201-P-0994 \$ 179,173.88 13 \$1,848.88 \$24,035.44 13.41% 2 2 2 2 4 3 13 \$ 8,958.69 5.00% \$ 62,710.86 \$ 44,793.47 \$1,656,152.64 \$ 1,656,152.64 \$53 \$1,041,068.12 62.86% 45 \$9 120 213 72 \$509 \$ 218,268.06 \$ 943,149.43 \$ 673,678.17	St Louis	Wildhorse Ridge	D17-0201-P-0943	\$	42,325.54	7	\$1,848.88	\$12,942.16	30.58%			3	4		7		5.00%	\$ 14,813.9	\$ 10,581.39
\$3,697.76 \$3,697.76 \$3,697.76 \$7,395.52 \$5,546.64 \$24,035.44 \$ 1,656,152.64 553 \$1,041,068.12 62.86% 45 59 120 213 72 509 \$ 218,268.06 \$ 943,149.43 \$ 673,678.17										\$0.00	\$0.00	5546.64	\$7,395.52	\$0.00					
\$ 1,656,152.64 553 \$1,041,068.12 62.86% 45 59 120 213 72 509 \$ 218,268.06 \$ 943,149.43 \$ 673,678.17	St Louis	Main Street Crossing Ph 2	D17-0201-P-0994	\$	179,173.88	13	\$1,848.88	\$24,035.44	13.41%		2	2	4		13		5.00%	\$ 62,710.8	5 \$ 44,793.47
45 59 120 213 72 509 \$ 218,268.06 \$ 943,149.43 \$ 673,678.17					4 656 453 65	FF2		64 044 050 40	C2 0CC/	\$3,697.76	\$3,697.76	3697.76	\$7,395.52	\$5,546.64		\$24,035.44			
				\$ 1	1,050,152.64	553		\$1,041,068.12	62.86%	AF	F0	120	212	72	F00	\$ 210,260,06		¢ 0/2 1/0 /	2 \$ 672 670 17
										45	23	120	213	12	203			J45,149.4	5 U/5,0/8.1/

% of Lots Built Out 92.04% % Paid if Built out 62.86%

	Α	В	С	D	E	F	G	
Total Cost of Project 2017		Actual % Paid in Refund	Total Cost times Actual % (A * B)	5 year Per Lot Refund Total (2017-2021)	Total that would have been paid by MAWC if all lots connected	Total Cost times .35 MAWC Proposed (.35 * A)	Total Cost times .25 Staff Proposal (.25 * A)	
\$	60,879.26	14.00%	\$8,523.10	\$1,709.88	\$ 3,419.76	\$21,307.74	\$15,219.82	
\$	114,339.01	14.00%	\$16,007.46	\$17,098.80	\$ 34,197.60	\$40,018.65	\$28,584.75	
\$	114,572.06	14.00%	\$16,040.09	\$59,845.80	\$ 61,555.68	\$40,100.22	\$28,643.02	
\$	151,480.68	14.00%	\$21,207.30	\$32,487.72	\$ 54,716.16	\$53,018.24	\$37,870.17	
\$	210,049.05	5.00%	\$10,502.45	\$84,476.92	\$ 91,326.40	\$73,517.17	\$52,512.26	
\$	37,451.98	5.00%	\$1,872.60	\$20,548.44	\$ 22,831.60	\$13,108.19	\$9,363.00	
\$	36,264.33	5.00%	\$1,813.22	\$4,566.32	\$ 9,132.64	\$12,692.52	\$9,066.08	
\$	134,556.27	6.50%	\$8,746.15	\$86,760.08	\$ 100,459.04	\$47,094.69	\$33,639.07	
\$	38,117.45	14.00%	\$5,336.44	\$6,534.24	\$ 13,068.48	\$13,341.11	\$9,529.36	
\$	22,797.54	24.87%	\$5,670.79	\$6,534.24	\$ 8,167.80	\$7,979.14	\$5,699.39	
\$	118,052.40	14.00%	\$16,527.34	\$65,342.40	\$ 65,342.40	\$41,318.34	\$29,513.10	
\$	113,224.25	13.20%	\$14,949.02	\$11,093.28	\$ 11,093.28	\$39,628.49	\$28,306.06	
\$	48,398.55	5.00%	\$2,419.93	\$31,430.96	\$ 31,430.96	\$16,939.49	\$12,099.64	
\$	332,740.25	5.00%	\$16,637.01	\$86,897.36	\$ 86,897.36	\$116,459.09	\$83,185.06	
\$	33,787.63	5.00%	\$1,689.38	\$14,791.04	\$ 14,791.04	\$11,825.67	\$8,446.91	
\$	280,183.11	5.00%	\$14,009.16	\$188,585.76	\$ 188,585.76	\$98,064.09	\$70,045.78	
\$	51,549.62	5.00%	\$2,577.48	\$22,186.56	\$ 22,186.56	\$18,042.37	\$12,887.41	
\$	44,502.04	5.00%	\$2,225.10	\$33,279.84	\$ 33,279.84	\$15,575.71	\$11,125.51	
\$	94,784.64	5.00%	\$4,739.23	\$3,697.76	\$ 3,697.76	\$33,174.62	\$23,696.16	
\$	114,274.05	5.00%	\$5,713.70	\$18,488.80	\$ 18,488.80	\$39,995.92	\$28,568.51	
\$	141,854.80	14.82%	\$21,024.45	\$59,164.16	\$ 59,164.16	\$49,649.18	\$35,463.70	
\$	47,381.57	5.00%	\$2,369.08	\$24,035.44	\$ 27,733.20	\$16,583.55	\$11,845.39	
\$	131,972.71	5.00%	\$6,598.64	\$42,524.24	\$ 42,524.24	\$46,190.45	\$32,993.18	
\$	42,325.54	5.00%	\$2,116.28	\$12,942.16	\$ 12,942.16	\$14,813.94	\$10,581.39	
\$	179,173.88	5.00%	\$8,958.69	\$24,035.44	\$ 24,035.44	\$62,710.86	\$44,793.47	
	\$2,694,712.67		\$218,274.09	\$959,057.64	\$1,041,068.12	\$943,149.43	\$673,678.17	
			This is 8.1% of	This is 35.6% of	This is 38.6% of			
			the total in A	the total in A	the total in A			

Missouri Public Service Commission

Respond Data Request

Data Request No.

0322

Company Name

MO PSC Staff-(All)

Case/Tracking No.

WR-2022-0303

Date Requested

1/31/2023

Issue

Rate Design - Class Cost of Service

Requested From

Karen Bretz

Requested By

John Robinett

Brief Description

Daronn A. Williams' Class Cost of Service Rebuttal testimony

Description

Please refer to Staff Witness Daronn A. Williams' Class Cost of Service Rebuttal testimony At page 5 lines 6-7, Mr. Williams states: "Staff does not object to MAWC's efforts to simplify the refund process

while remaining competitive and incentivizing residential

developments in its service areas." Please provide a complete list of whom Mr. Williams considers to be MAWC's competitors as described

in this statement and indicate why they are in competition with

MAWC.

Response

Staff is referring to the other providers who could offer incentives to developers to build homes in certain service areas outside of the MAWC service areas. Please see attached. Data Request Response

provided by Daronn Williams (daronn.williams@psc.mo.gov).

Objections

NA

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission if, during the pendency of Case No. WR-2022-0303 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the MO PSC Staff-(All) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to MO PSC Staff-(All) and its employees, contractors, agents or others employed by or acting in its behalf.

Security:

Public

Rationale:

NA