

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	File No. WR-2017-0285
General Rate Increase for Water and Sewer)	File No. SR-2017-0286
Service Provided in Missouri Service Areas.)	

REPLY BRIEF OF THE CITY OF JEFFERSON, MISSOURI

In reply to the initial briefs filed herein, the City of Jefferson, Missouri ("the City") reasserts the contention that is argued in the initial brief of St. Joseph, Missouri, in which the City joined and concurred, and is argued in the initial brief of the City of Warrensburg--a contention which unites the Coalition Cities--that the Commission should direct the Company to return to the eight rate districts that existed prior to the Report and Order in Case No. WR-2015-0301. The eight-district rate structure best reflects the actual cost of service of each of the MAWC rate districts, and allows all customers to benefit from the sharing of truly common costs of service.

If either the Company's or Staff's rate design proposal is adopted by the Commission in this case, the Commission should order the Company to engage in a collaborative or working docket process to calculate an appropriate rate-offset mechanism to insulate the Coalition Cities, in whole or in part, from having to pay a full share of capital improvements in other cities and districts in addition to having borne the full cost of capital improvements in their own cities since the turn of the Century. Alternatively, the collaborative or working group should investigate the creation of a capital expenditure tracking mechanism which would enable the Company, Staff, Public Counsel and all parties to keep closer track of capital project costs of the Company in real time.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 9th day of April, 2018, to:

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