

**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 Increase for	)	Case No. WR-2008-0311
Water and Sewer Service Provided in	)	
Missouri Service Areas	)	

**INTERVENOR CITY OF JOPLIN, MISSOURI'S  
SECOND SET OF DATA REQUESTS TO THE  
UTILITY SERVICES DIVISION OF THE  
MISSOURI PUBLIC SERVICE COMMISSION**

Comes now Intervenor City of Joplin, Missouri ("Joplin"), in accordance with Commission Rule 4 CSR 240-2.090(2) and the Order Adopting Procedural Schedule and Approving Motion to Modify Suspension Order and Notice, and submits the following data requests to the Utility Services Division of the Missouri Public Service Commission ("Staff") concerning its September 3, 2008 Direct Testimony and Class Cost-Of-Service & Rate Design Report ("Report") filed in this proceeding:

1. Please provide copies of the Staff's responses to the data requests of all other parties regarding its indicated Direct Testimony and Report.

2. At Page 3, Line 8 of his Direct Testimony, Mr. Russo states "Staff is recommending that the Commission adopt Staff's CCOS study." At the same time, Page 2 of the Report notes that the "Staff's" CCOS Study does not include any allowance for a true-up estimate . . . because it is not possible to accurately spread this estimate . . .". In view of these statements, please explain:

- (a) the form in which the Commission might adopt Staff's CCOS study even though it does not contain the specific cost allocation and rate design amounts that Staff may ultimately propose in this proceeding; and,
- (b) the likelihood, including the rough order of magnitude if possible, that the Minimum Charges currently proposed by Staff for each District will be impacted by the true-up allowance.

3. In the Schedules of the Report for the Joplin District references are made to documents that do not accompany the Report. In this regard, please provide copies of the following:

- (a) Schedule E referenced at Schedule 3-22 and 24-SJOP;
- (b) the "flowing page" or "following pages" referenced for each of Factors 9, 10, and 18 in Schedule 3-SJOP; and,
- (c) to the extent not accompanying the Report, copies as identified in (a) and (b) applicable to each of the other Districts.

4. With respect to the derivation of the currently proposed \$8.73 monthly Minimum Charge for 5/8" Water Service in the Joplin District, consisting of \$2.83 (Meters), \$2.19 (Services), and \$3.71 (Billing & Collecting) as shown in Schedule 3-13-SJOP of the Report, please explain the following:

- (a) why the relevant units applied in deriving the \$2.19 monthly amount for Services is not 27,353 as reported for Factor 10 on Schedule 3-30-SJOP, but instead is 24,981, which appears to exclude Private Fire Protection; i.e.,  $27,353 - 2,372 = 24,981$ ; and,

- (b) the extent to which the explanation provided in response to (a) is equally applicable to each District in the Report.

5. Regarding the monthly Minimum Charges presently proposed by Staff other than those for 5/8" Water Service; e.g., \$9.56 for 3/4" through \$338.53 for 8" in Schedule 2-2-SJOP, please provide the data and calculations by which these other Minimum Charge amounts were derived for each District.

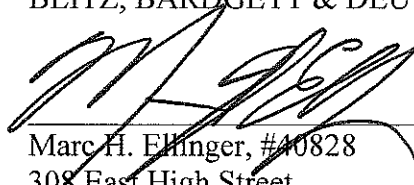
6. Given the Staff's definition of Customer Costs as set forth on Page 3 of the Report, which is applied without variation in the development of the proposed \$8.73 Minimum Charge for Joplin, please explain why Staff appears to be taking the position that a Minimum Charge should be based solely on a Customer Costs definition without regard to such other ratemaking considerations as rate continuity and non-abruptness, revenue predictability and stability, and the inexactness of distinguishing customer-related from usage-related costs.

7. Further with respect to the definition of Customer Costs, which Page 3 of the Report states "are those costs associated with the number of customers, regardless of consumption," please explain the extent to which this definition comports with a cost-causation standard of ratemaking. By illustration, does Staff agree that meter and meter reading costs are not caused by either customers connecting to a utility system or taking service therefrom, but rather because decisions (appropriately) have been made to price utility services on a two-part basis consisting of a fixed component and a consumption-based component? Please consider in the Staff's response the fact that, in the instant case, no meter-related costs exist for fire protection because decisions have been made not to price this service on a consumption basis.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

A handwritten signature in black ink, appearing to read 'M. Ellinger', is written over a horizontal line.

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## CERTIFICATE OF SERVICE

I hereby certify that true copies of the above and foregoing were sent to each of the following persons via electronic mail, on this 10<sup>th</sup> day of September, 2008:

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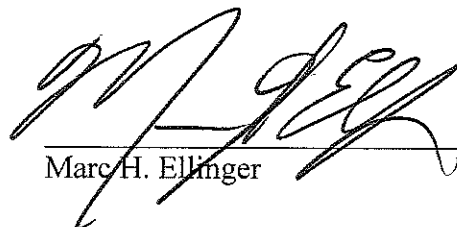
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