

**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	)	File No. WR-2015-0301
Water and Sewer Service Provided in	)	
Missouri Service Areas	)	

**INTERVENOR CITY OF RIVERSIDE'S FIRST SET OF DATA REQUESTS  
TO MISSOURI-AMERICAN WATER COMPANY**

1. Please provide, by existing district, projected significant (in excess of \$250,000) capital expenditures, plant additions, or infrastructure upgrades for the next five years and for the next ten years.

2. Please provide the cost of each of the infrastructure projects identified below by Mr. Kevin Dunn as infrastructure investments of the company in Platte County:

- Install 6002' of 24" DI in Riverside at Horizons Parkway
- Replace 12" main at the BNSF RR Bridge Demolition
- Relocate 1956' of 12" main on Mattox Rd
- Relocate 132' of 6" & 413.5' of 12" on 72<sup>nd</sup> St
- Replace filter media
- Replace 16" Control Valve at Water Treatment Facility

3. Please provide the amount contributed to the cost of the infrastructure investments listed above by the Developer or City.

4. Please describe the methodology by which MAWC calculates the customer water usage for residential, commercial and industrial customers in the Platte County Water District.

5. Please describe the methodology for allocating cost of services to residential, commercial and industrial customers.

6. Please provide monthly Platte County Water District residential, commercial and industrial water customer usage since 2006.
7. Please provide the number of residential, commercial and industrial customers in the Platte County Water District.
8. Please define Average Hourly Consumption.
9. Please provide a list of all the names and addresses of all MAWC customers within the Platte County Water District who have complained about their water quality or hardness of the water or calcium deposits in their pipes or appliances since 2008.
10. Please provide a list of all the names and addresses of all MAWC customers within the State of Missouri who have complained about the hardness of the water or calcium deposits in their water since 2008.
11. Please provide all records, including email correspondence by and between residents and/or company representatives or by/between/or amongst MAWC employees and officers, regarding the “scaling” issue or “hardwater” issues complained of by the residents of Platte County.
12. Please provide a list, a description and any and all records of all malfunctions in the Platte County Water Treatment Plant since 2008.
13. Please provide a list, a description and any and all records of any incident in which a malfunction in the Platte County Water Treatment Plant may have caused foreign substances to get into the water supplied to the customers of the Platte County Water District.
14. Please provide a list and description and any and all records related to any actions taken by MAWC in response to what is known as the “scaling” problem in the Platte County Water District.

15. Please provide a copy of any and all materials and records used to prepare for the Town Hall meeting in Riverside, Missouri, on March 3, 2016.

16. Please provide the power point presentation given at the Town Hall meeting in Riverside, Missouri, March 3, 2016.

17. Please provide a list of customers in the Platte County Water District to whom MAWC provided whole house water filters, as well as the cost charged to each customer.

18. Please provide copies of all confidentiality agreements MAWC executed with customers in the Platte County Water District.

Respectfully submitted,

SPENCER FANE LLP

By: /s/ Joseph P. Bednar, Jr.

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### **CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing Intervenor City of Riverside's First Data Request to Missouri-American Water Company was sent by e-mail this 7<sup>th</sup> day of March, 2016, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Joseph P. Bednar, Jr.

Joseph P. Bednar, Jr.