

**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
THIRD SET OF DATA REQUESTS TO THE
UTILITY SERVICES DIVISION OF THE
MISSOURI PUBLIC SERVICE COMMISSION**

Comes now the 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 the Allocation Factors utilized in its September 3, 2008 Class Cost-Of-Service & Rate Design Report ("Report") filed in this proceeding:

1. Based on a comparison of the descriptions and stated applications for each of Allocations Factors 1 through 17 in the Report, such as those set forth in Schedule 3-19 through 35-SJOP, with the descriptions and stated applications in Mr. Herbert's customer class cost of service study ("CCOSS") for each of the same Allocation Factors, no differences in procedures appear to exist except for Allocation Factor 7 and other than for certain data utilized to develop the remaining Allocation Factors. Please confirm this observation with qualification as may be necessary.
2. RE: Allocation Factor 1. Please provide the data and calculations that cause differences in the Average Daily Consumption (Thousand Gallons) for Customer Classifications

shown by District in the Report and in Mr. Herbert's CCOSS, such as the differences indicated below for Joplin:

<u>Customer Classification</u>	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Residential	3,976	3,697
Commercial	2,754	3,009
Industrial	3,756	4,153
Other Public Authority	389	387
Sales For Resale	400	861
Private Fire Protection	21	24
Public Fire Protection	77	42
Total	11,373	12,173

3. RE: Allocation Factor 2. Please provide the following:

- (a) the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Weighted Factors		
Average Daily Consumption	0.6579	0.5882
Maximum Day Extra Capacity	0.3421	0.4118
Maximum Day Extra Capacity Factor		
Commercial	0.75	0.80
Other Public Authority	0.75	0.80
Sales For Resale	0.90	0.60
Maximum Day Extra Capacity Ratio	0.52	0.70

- (b) copies of Schedules D applicable to each District, such as referenced on Schedule 3-20-SJOP.

4. RE: Allocation Factor 3. Please provide the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Weighted Factors		
Average Daily Consumption	0.6244	0.5613
Maximum Day Extra Capacity	0.3247	0.3930
Fire Protection	0.0509	0.0457

5. RE: Allocation Factor 4. Please provide the following:

- (a) the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Weighted Factors		
Average Hourly Consumption	0.2919	0.3172
Maximum Hour Extra Capacity	0.5179	0.4760
Fire Protection	0.1902	0.2068
Maximum Hour Extra Capacity Factor		
Commercial	2.50	2.80
Industrial	1.20	1.50
Other Public Authority	2.50	2.80
Sales For Resale	3.20	2.00
Maximum Hour Extra Capacity Ratio	1.77	1.50

- (b) confirmation that differences in Average Hourly Consumption by Customer Classification are totally attributable to the respective differences in Average Daily Consumption, such as with respect to the data for Allocation Factor 1.

6. RE: Allocation Factor 5. Please provide the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Denominator of Fire Protection Weight In Gallons	6,260,000	5,900,000

7. RE: Allocation Factor 6. Please provide the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Horsepower of Pumps		
Associated with Maximum Day	4,350	4,500
Associated with Maximum Hour	160	175

8. RE: Allocation Factor 7. Please provide the data and calculations that cause differences in certain figures shown by District in the Report and in Mr. Herbert's CCOSS, such as identified below with respect to Joplin:

	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Total Footage of Mains		
Transmission	325,873	417,044
Distribution	1,607,496	1,738,356

9. RE: Allocation Factor 9. Please provide the data and calculations that cause differences in the 5/8" Dollar Equivalent for Customer Classifications shown by District in the Report and in Mr. Herbert's CCOSS, such as the differences indicated below for Joplin:

<u>Customer Classification</u>	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Residential	22,303	22,358
Commercial	5,384	5,086
Industrial	1,060	1,002
Other Public Authority	976	913
Sales For Resale	330	329
Private Fire	0	0
Total	<u>30,051</u>	<u>29,688</u>

10. RE: Allocation Factor 10. Please provide the data and calculations that cause differences in the 3/4" Dollar Equivalent for Customer Classifications shown by District in the Report and in Mr. Herbert's CCOSS, such as the differences indicated below for Joplin:

<u>Customer Classification</u>	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Residential	21,012	21,077
Commercial	3,458	3,260
Industrial	205	167
Other Public Authority	280	237
Sales For Resale	26	25
Private Fire Protection	2,372	2,372
Total	27,353	27,138

11. RE: Allocation Factors 11 and 12. Referring to Schedule 3-31-SJOP, please confirm with qualification as may be necessary, that the phrase “expenses other than being allocated” means that the Allocation Factors shown by Customer Classification are derived from expenses attributed to Joplin other than those reported on Schedule 3-31-SJOP; e.g., Transmission & Distribution Operating Expenses beyond \$317,764.

12. RE: Allocation Factor 13. Please provide the data and calculations that cause differences in Total Customers for Customer Classifications shown by District in the Report and in Mr. Herbert’s CCOSS, such as the differences indicated below for Joplin:

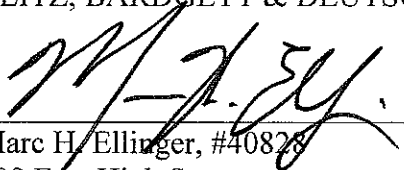
<u>Customer Classification</u>	<u>Staff Report</u>	<u>Herbert CCOSS</u>
Residential	20,588	20,656
Commercial	2,912	2,740
Industrial	112	78
Other Public Authority	176	142
Sales For Resale	7	6
Private Fire Protection	332	332
Public Fire Protection	0	0
Total	24,128	23,954

13. RE: Schedule 5-1-SJOP. Please explain the cause of the difference in Restrictive Diameters Squared for Private Hydrants; i.e., 6.25 in the Report and 26.50 in Mr. Herbert’s CCOSS.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:



Marc H. Ellinger, #40828
308 East High Street
Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358
E-mail: mellinger@blitzbardgett.com

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 12th day of September, 2008:

Bryon E. Francis
E-mail: bfrancis@armstrongteasdale.com

Office of General Counsel
E-mail: GenCounsel@psc.mo.gov

Jacqueline U. Levey
E-mail: jlevey@armstrongteasdale.com

James M. Fischer
E-mail: jfischerpc@aol.com

Joe Bednar
E-mail: jbedna@armstrongteasdale.com

Larry W. Dority
E-mail: lwdority@sprintmail.com

John McClelland
E-mail:
jmcclelland@armstrongteasdale.com

Keith Krueger
E-mail: keith.krueger@psc.mo.gov

Kent Lowry
E-mail: klowry@armstrongteasdale.com

Lewis Mills
Christina Baker
E-mail: opcservice@ded.mo.gov

Matthew Turner
E-mail: mturner@armstrongteasdale.com

Lisa Langeneckert
E-mail: llangeneckert@spvg.com

David Woodsmall
E-mail: dwoodsmall@fcplaw.com

Mark W. Comley
E-mail: comleym@ncrpc.com

Jeremiah D. Finnegan
E-mail: jfinnegan@fcplaw.com

Michael A. Evans
E-mail: mevans@hstly.com

Stuart Conrad
E-mail: stucon@fcplaw.com

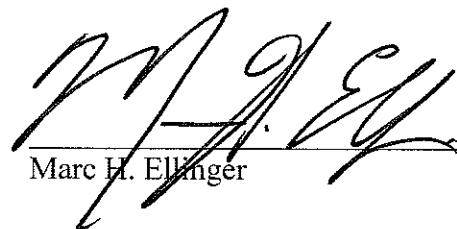
Sherrie A. Schroder
E-mail: saschroder@hstly.com

Dean Cooper
E-mail: dcooper@brydonlaw.com

William R. England, III
E-mail: trip@brydonlaw.com

Diana M. Vuylsteke
E-mail: dmvuylsteke@bryancave.com

Ed Grubb
E-mail: Ed.Grubb@amwater.com



Marc H. Ellinger