

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

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

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

The City of Joplin ("Joplin") hereby provides the following Data Requests to Missouri-American Water Company ("MAWC") pursuant to the Commission's Rule 4 CSR 240-2.090. Joplin is requesting MAWC to respond to these requests within twenty (20) days of receipt.

1. Please provide, for the last ten years, by district, actual versus projected significant (in excess of \$250,000) capital expenditures, plant additions, or infrastructure upgrades.
2. Please provide, by existing district, projected significant (in excess of \$250,000) capital expenditures, plant additions, or infrastructure upgrades for the next ten years (by year).
3. Please provide for the last ten years, by month, the company's actual versus projected weather forecasting.
4. Please explain Missouri American Water's position on climate change.
5. Please explain Missouri American Water's belief as to the impact of climate change on its business practices.
6. Please identify whether Missouri American Water believes that any water usage over the last 10 years has been impacted by global climate change.

7. If your answer to Request 6 is yes, please quantify the districts affected and the amount of usage which is solely attributed to global climate change.

8. Please identify any change in water usage attributable to rate increases in the last 10 years by district as such districts existed on January 1, 2007.

9. For the last ten years, please provide, the company's actual versus projected staffing levels.

10. Please provide all planned future issuances of debt by American Water and the amount of such debt to be allocated to Missouri American Water.

11. Please provide all planned future issuances of stock, of any type, by American Water and identify the amount of any capital so raised to be allocated to Missouri American Water.

12. Please provide a chart similar to Appendix B to the June 30, 2017 Transmittal Letter, figuring the dollar change and percentage change to each district if the Commission were to maintain the existing three districts with district specific pricing.

13. With respect to future capital expenditures outlined in the testimony of Bruce W. Aiton, please identify all projects making up the \$68 million in sewer and water facilities during calendar year 2016.

14. With respect to capital expenditures as outlined in the testimony of Bruce W. Aiton, please identify all projects included in the \$230.2 million beginning 2017, ending May 2018.

15. Regarding future capital expenditures in the testimony of Bruce W. Aiton, please identify all capital expenditures making up the \$194 million during the twelve months ending

May 31, 2019.

16. With respect to the expenditure to be incurred after the true up period closes and in the future test year, identify how the company will ensure that all expenditures will be fully made and put in service during the time period January 1, 2018 through May 31, 2019.

17. With respect to the testimony of Bruce W. Aiton, please identify the basis for the statement as follows: “However, changing climatic conditions suggest that historical hydrologic data (which in many cases only reflect 50-100 years of rainfall and stream flow measurement collection – a quite short period in geologic or climatic time) may not accurately predict future conditions.”

18. With respect to the testimony of Gregory P. Roach, please explain the effects of arithmetic mean usage, versus the methodology used in Table GRP-2, upon the Southwest District and more specifically the City of Joplin, to the extent such City identifying information is available.

19. With respect to the testimony of Gregory P. Roach, at page 26, please identify the basis for concluding that 2,500 residential dwellings, as opposed to the full 3,060 destroyed structures, were rebuilt.

20. With respect to the testimony of Gregory P. Roach, at page 26, what is the effect of fewer new residential dwellings upon water usage in the Joplin District?

21. With respect to the testimony of Gregory P. Roach, at page 26, please identify if there are more or fewer residents within the Joplin District from the date of the tornado in 2011 to the date upon which Gregory P. Roach’s testimony is based.

22. Please identify the basis for the number of dwellings constructed and population counts within the District of Joplin.

23. With respect to the testimony of Gregory P. Roach, at page 26, please identify the demographic changes, including persons per household, with respect to the new construction or reconstruction of residential dwellings that have occurred since May 2011.

24. With respect to the testimony of Gregory P. Roach, at page 36, line 1-2, please quantify the savings and avoided costs that have benefitted customers through the rulemaking process by district for each year included in Gregory P. Roach's conclusions.

25. With respect to the testimony of Constance E. Heppenstall, please identify who instructed the witness to develop rate schedules to move toward a tariff pricing rate schedule applicable to all water customers statewide as closely as possible.

26. Please identify all states in which American Water operates and for each state identify if the tariffs are single tariff across the state, district specific or a hybrid.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ Marc H. Ellinger