

**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 STATEMENT OF POSITIONS ON THE
ISSUES**

COMES NOW Intervener City of Riverside Missouri, by and through counsel, and for its *Statement of Positions on the Issues*¹, states their position on the following limited issues:

1. Regulatory Policy

The Commission should maintain a policy that permits the Missouri American Water Company the ability to earn a fair return while providing assurance the rates set for MAWC are just and reasonable to all customers, including but not limited to true residential ratepayers. The policy should include that if there are quality of water issues as to consumption or destructive to a customer's pipes and/or appliances, no revenue increase should be granted, and a rate decrease should be considered, until such issues are resolved.

3. Revenue Stabilization Mechanism Proposal

Should the Commission adopt the Revenue Stabilization Mechanism proposed by MAWC?

No.

6. Environmental Cost Adjustment Mechanism ("ECAM") Proposal

Should an ECAM be approved in this case as proposed by MAWC and, if so, what conditions, if any, should be implemented?

¹ Based on the *Amended Joint List of Issues*, etc.

No

31. District Consolidation/Consolidated Pricing

Should the Commission adopt the consolidation of districts proposed by Staff, the alternative consolidation proposed by MAWC, or maintain the status quo as proposed by OPC?

The Commission should consolidate districts in order to protect the true residential rate payer. A just and reasonable design would take that into consideration and establish a specific rate class for the true residential ratepayer who is responsible for paying their individual water bill. In addition to the unjust and unreasonable situation the true residential ratepayers experience due to the current rate design as to customer classes, it is aggravated by the rate design philosophy of “district specific rate making”. It is unjust and unreasonable for a resident to pay a differential of over 100% for his water just because he lives in a particular area.

32. Rate Design & Customer Charge

See Statement as to #31.

Wherefore the City of Riverside reserves it right to modify its position on this or any other issue raised in the case.

Respectfully submitted,

SPENCER FANE LLP

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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 11th 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.