

**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 JOPLIN'S STATEMENT OF POSITION

The City of Joplin takes a position only on the issues designated below. For its Position Statement, Joplin states:

4. District Allocations

Should a cap of \$20 per customer be imposed on allocations of Corporate A&G expenses and Service Company expenses to small districts?

No. Joplin adopts Staff's position on this issue.

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 not adopt the consolidation of districts proposed by Staff or MAWC. The Commission should maintain the status quo as proposed by OPC, for the reasons outlined by OPC: water service is local, the principles of cost causation, inappropriate price signals to consumers, and overinvestment in infrastructure. District consolidation would cause unnecessary and unfair subsidization.

District consolidation would not produce just or reasonable rates because such rates would not reflect the actual costs of providing service to the various districts. The City of Joplin endorses the principle of cost causation in setting rates, and asserts that district specific pricing is the only method supported by the evidence in this case.

32. Rate Design & Customer Charge

A. How should rates be designed?

The Commission should design rates in a way that is just, reasonable and fair to the utility's customers. As the Commission stated in WR-2011-0337 (Order Approving

Non-Unanimous Stipulation and Agreement, March 7, 2012), “[t]he Commission’s guiding purpose in setting rates is to **protect the consumer** against the natural monopoly of the public utility[.]”

B. How should the customer charge be adjusted?

The customer charge should be set at minimum levels consistent with achieving a reasonable level of revenue stability and predictability on an equivalent basis across customer classes and districts.

The City of Joplin does not take a position on any other issue at this time, but reserves the right to do so as additional evidence is presented to the Commission.

WHEREFORE, the City of Joplin respectfully submits its Statement of Position.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing was sent by email 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/ Stephanie S. Bell