

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

In the Matter of Missouri-American Water Company    )  
Request for Authority to Implement a General Rate    )  
Increase for Water and Sewer Service Provided in    )  
Missouri Service Areas.                                    )  
**Case No. WR-2015-0301**

**AMENDED  
LIST OF ISSUES, LIST AND ORDER OF WITNESSES,  
ORDER OF OPENING STATEMENTS, AND  
ORDER OF CROSS-EXAMINATION**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and on behalf of all of the parties,<sup>1</sup> submits the following *Amended List of Issues, List and Order of Witnesses, Order of Opening Statements, and Order of Cross-Examination*:

**Amended List of Issues:**

This *Amended List of Issues* reflects the status of the parties' discussions as of today. An agreement in principle on revenue requirement has been reached and a *Non-unanimous Stipulation and Agreement* reflecting the same is being drafted. Other issues, principally relating to rate design, remain for discussion next week. This amended list is being filed in order to alert the Commission and all interested parties as to the identity of the remaining issues, all of which will be tried (if at all) the week of March 21 – March 25, 2016.

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<sup>1</sup> Most of the parties affirmatively indicated their agreement with this *Amended List of Issues*; however, some had not as of the time of filing. No party affirmatively indicated its disagreement with this *List of Issues*.

**List and Order of Witnesses:**

**1. Regulatory Policy**

Norton for Kartmann (MAWC)  
Watkins (MAWC)  
Haye for Petry (MAWC)  
Hyneman (OPC)  
Dietrich (Staff)

**10. Energy Efficiency**

A. Should the Commission adopt the capital deferral mechanism and collaborative proposed by MoDOE to incentivize MAWC to increase supply-side energy efficiency and water loss reduction investment?

Epperson (MoDOE)  
Hyman (MoDOE)  
Norton for Kartmann (MAWC)  
Watkins (MAWC)  
Dunn (MAWC)  
Watkins for Wood (MAWC)  
Marke (OPC)  
Merciel (Staff)  
Oligschlaeger (Staff)

**17. Affiliate Transaction Rulemaking**

Should the Commission open a separate case to consider adopting an affiliate transaction rule for water companies?

Hyneman (OPC)  
Dietrich (Staff)  
Haye for Petry (MAWC)

**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?

McDermott (MAWC)  
Herbert (MAWC)  
Tinsley (MAWC)

Haase (Joplin)  
Busch (Staff)  
Marke (OPC)  
Smith (OPC)  
Collins (MIEC)

### **32. Rate Design & Customer Charge**

- A. How should rates be designed?
- B. How should the customer charge be adjusted?
- C. How should purchased power expense be allocated?

Herbert (MAWC)  
Rungren (MAWC)  
Tinsley (MAWC)  
Watkins (MAWC)  
Hyman (MoDOE)  
Collins (MIEC)  
Meyer (MIEC)  
Rose (Riverside)  
Marke (OPC)  
Smith (OPC)  
Busch (Staff)

### **34. Low-Income Tariff**

Should the Commission adopt a low-income tariff for MAWC?

Tinsley (MAWC)  
Marke (OPC)  
Busch (Staff)

### **37. Residential Customer Usage/Revenues**

- A. How should normalized residential usage be determined for calculating revenues?
- B. Is the Company experiencing declining usage?

Roach (MAWC)  
Dunn (MAWC)  
Tinsley (MAWC)  
Marke (OPC)  
Mantle (OPC)

Hyneman (OPC)  
Busch (Staff)

#### 47. Union Issues

- A. Should the Commission condition any rate increase upon MAWC's filling unfilled bargaining unit positions?
- B. Should the Commission order semi-annual reporting of various items as urged by the Unions?
- C. Should the Commission order MAWC to comply with and implement American Water Works' valve maintenance program?

Norton for Wood (MAWC)  
Dunn for Wood (MAWC)  
Ratermann (Unions)

#### ***Order of Cross-Examination:***

**MAWC's Witnesses:** MoDOE, MIEC, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, Staff.

**Staff's Witnesses:** MoDOE, MIEC, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, MAWC.

**OPC's Witnesses:** MoDOE, MIEC, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, Staff, MAWC.

**MoDOE's Witnesses:** Staff, MIEC, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, MAWC.

**MIEC's Witnesses:** Staff, MoDOE, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, MAWC.

**Joplin's Witness:** Staff, MoDOE, MIEC, Brunswick, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, MAWC.

**Riverside's Witness:** Staff, MoDOE, MIEC, Brunswick, Joplin, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, Unions, OPC, MAWC.

**Unions' Witness:** Staff, MoDOE, MIEC, Brunswick, Joplin, Riverside, St. Joseph, Warrensburg, PWSDs, Stonebridge, Triumph, OPC, MAWC.

### ***Order of Opening Statements***

Missouri American Water Company (MAWC)  
Staff of the Public Service Commission (Staff)  
Office of the Public Counsel (OPC)  
Missouri Division of Energy (MoDOE)  
Missouri Industrial Energy Consumers (MIEC)  
City of Brunswick  
City of Joplin  
City of Riverside  
City of St. Joseph  
City of Warrensburg  
Public Water Supply Districts (PWSDs)  
Stonebridge Village  
Triumph Foods  
Unions

**WHEREFORE**, Staff prays on behalf of all of the parties herein that the Commission will accept this *Amended List and Order of Witnesses, Order of Opening and Order of Cross-Examination*.

Respectfully submitted,

s/ Kevin A. Thompson  
**KEVIN A. THOMPSON**  
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Attorneys for the Staff of the Missouri Public Service Commission.

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **11<sup>th</sup> day of March, 2016**, on 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/ Kevin A. Thompson**