

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	Case No. WR-2010-0131
A General Rate Increase for Water and Sewer)	SR-2010-0135
Service Provided in Missouri Service Areas.)	

Motion for Reconsideration

Comes now Missouri-American Water Company (MAWC) and, on behalf of the Consolidated Tariff Collaborative Group and Main Extension Collaborative Group (collectively the "Collaborative Groups"), moves the Missouri Public Service Commission's (Commission) to reconsider its July 5, 2011 *Order Regarding Main Extension and Consolidated Tariffs*. In support of this motion, MAWC states as follows:

1. On July 1, 2011, the Collaborative Groups caused to be filed their *Report of Main Extension and Consolidated Tariff Collaborative Groups*. This Report indicated that after nearly a year of meetings and/or calls, the Collaborative Groups had reached consensus on the terms and conditions for a consolidated water tariff, including tariff language for extension of mains (collectively the "Consolidated Tariff"). Attached to the Report was a copy of the draft Consolidated Tariff. The Report requested that the Commission issue an order accepting the Report as the final report of the Collaboratives, and stated that, within 30 days of such an order, MAWC would formally file tariffs consistent with those attached to the Report.

2. What is not emphasized in the Report is the fact that this Consolidated Tariff was the product of numerous meetings and calls, countless drafts and spirited (if not contentious) debate. This Consolidated Tariff contains terms and conditions for the

provision of water service in all of MAWC's existing Districts in the State of Missouri as of January 31, 2011. It does not contain revised rates for water service.

3. On July 5, 2011, the Commission issued its *Order Regarding Main Extension and Consolidated Tariffs* directing that any further filings regarding Main Extensions and Consolidated tariffs shall be made in MAWC's pending general rate case, File No. WR-2011-0337. The Commission has suspended the revised tariff sheets initiating the general rate case for the full statutory period, until May 27, 2012. The revised tariffs that gave rise to the general rate case do not contain terms and conditions for the provision of water service and thus do not seek to change or alter any of the terms and conditions contained in the Consolidated Tariff agreed to by the Collaborative Groups.

4. The Collaborative Groups request reconsideration of the Commission's July 5, 2011, Order as they believe that the filing of the Consolidated Tariff in MAWC's pending rate case will 1) likely lead to its suspension (concurrent with the suspension of the revised rate tariffs) and thus unnecessarily prolong implementation of the terms and conditions contained by consensus in the Consolidated Tariff; and 2) possibly reopen the Main Extension and Consolidated Tariffs to further debate, thus undermining, if not completely erasing, all of the significant efforts that have taken place over the last twelve (12) months to produce the consensus Consolidated Tariff.

5. Specifically, the Collaborative Groups request the Commission allow the Consolidated Tariff to be filed in the instant docket and not in MAWC's pending rate case. Alternatively, if the Commission is not willing to reopen the instant docket, the Collaborative Groups request that the Commission allow the Consolidated Tariff to be

filed in a new case with a new file number, and not consolidate it with MAWC's pending rate case.

WHEREFORE, MAWC, on behalf of the Main Extension Collaborative Group and the Consolidated Tariff Group, respectfully requests the Commission to reconsider its July 5, 2011 Order regarding Main Extension and Consolidated Tariffs and allow the Consolidated Tariff to be filed in the instant docket (or in a new docket) and not in MAWC's pending rate case (WR-2011-0337) and for such other relief as is appropriate in the circumstances.

Respectfully submitted,

/s/ W.R. (Trip) England, III

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record in Case No. ER-2010-0131, this 1st day of August, 2011.

/s/ W.R. (Trip) England, III