

**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-2011-0337
A General Rate Increase for Water and Sewer	)	SR-2011-0338
Service Provided in Missouri Service Areas.	)	

**MAWC RESPONSE TO REQUEST FOR LOCAL PUBLIC HEARINGS  
AND CUSTOMER COMMENT CARDS**

Comes now Missouri-American Water Company (MAWC or Company), and, in response to the Office of the Public Counsel's (Public Counsel) Request for Local Public Hearings and Customer Comment Cards, states as follows to the Missouri Public Service Commission (Commission):

**PUBLIC COUNSEL REQUEST**

1. On August 15, 2011, Public Counsel filed its Request for Local Public Hearings and Customer Comment Cards (Public Counsel Request). Therein, Public Counsel suggested that the Commission conduct seventeen (17) local public hearings and direct that a customer comment card be sent to MAWC's approximately 457,000 customers for return to the Commission for receipt and processing "by the Commission as are other customer comments and concerns" (Public Counsel Request, para. 7).

2. Public Counsel also proposes that the local public hearings be scheduled during the months of December 2011 and January 2012, and that each of the seventeen (17) hearings start with a question and answer session at 5:30 p.m. with the local hearing themselves beginning at 6:00 p.m. Thus, Public Counsel's proposal is that the Commission conduct seventeen (17) hearings, on seventeen (17) different days, over the holiday season at a time when the parties will be working on short deadlines preparing testimony, responding to discovery, attending prehearing and discovery

conferences and attending to other aspects of the rate case process.

### **MAWC LOCAL HEARING PROPOSAL**

3. MAWC recommends/proposes an alternate local public hearing proposal. The Company's objective in putting forth this proposal is to provide the opportunity for a sampling of a substantial part of MAWC's service territory, while being mindful of the Commission and party resources that must be expended in the local hearing process. Because of the variety of methods customers have to gather information about the request and to communicate with the Commission and Public Counsel (Internet, telephone, U.S. Mail, electronic mail, etc.), it would appear to be less necessary to provide one hundred percent (100%) local hearing coverage of MAWC's territory. This being said, MAWC believes that its proposal will provide substantial coverage of MAWC's service territory as local hearings would be conducted within 30 miles of approximately 456,965 of MAWC's approximately 457,678 customers (or 99.8%) (*See Appendix A*).

4. Accordingly, MAWC proposes the use of the following local public hearing locations and groupings in this case:

- **Branson** at noon combined with **Joplin** at 6 p.m.
- **Sedalia** at noon combined with **Warrensburg** at 6 p.m.
- **Riverside** at noon combined with **St. Joseph** at 6 p.m.
- **St. Charles** at noon combined with **St. Louis** at 6 p.m.
- **Brunswick** at 6 p.m.
- **Mexico** at noon combined with **Jefferson City** at 6 p.m.

5. Granting the MAWC proposal would reduce the number of days associated with this process from seventeen (17) to six (6), while still providing a substantial number of

customers with the opportunity to appear at a local public hearing.

### **CUSTOMER COMMENT CARDS**

6. In addition to proposing seventeen (17) local hearings, Public Counsel also requests that the Commission direct the use of a customer comment form to be sent to each individual customer. MAWC does not object in principle to the use of a comment card. The purpose of the card, if utilized, should provide an additional avenue for customers to communicate any concerns they may have to the Public Counsel and further reduce the need for local public hearings.

7. However, Public Counsel's request further suggests that the cards be received and processed "by the Commission as are other customer comments and concerns" (Public Counsel Request, para. 7). MAWC is somewhat unsure what this means. At first glance, it appears that the Public Counsel is requesting that the Commission go back down the difficult road it traveled in Case No. GR-2009-0355 (Missouri Gas Energy rate case). The return of these cards to the Commission would again beg the questions as to what they are (evidence? If so, of what?) and what use may be made of them.

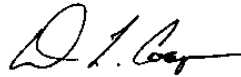
8. If the MGE customer response is indicative of generally expected customer response, the Commission can expect over 12,000 of these cards to be returned, as MAWC and Missouri Gas Energy have similarly sized customer bases.

9. MAWC believes that to the extent these cards are used, they should be provided for the purpose of allowing the Public Counsel the opportunity to collect comments from its customers. Accordingly, the forms should be addressed to the Public Counsel, and not the Commission. Public Counsel recognizes this as a possible result of its request, as it states "if the Commission is unable or unwilling to receive and process the customer comment cards, Public Counsel would agree to have

the customer comment cards be addressed to Public Counsel for receipt and processing” (Public Counsel Request, para. 7). Therefore, to the extent the cards are used, they should be mailed to the Public Counsel.

WHEREFORE, MAWC respectfully requests the Commission consider the information provided herein and, thereafter, issue such order as the Commission shall find to be reasonable and just.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 19<sup>th</sup> day of August, 2011, to:

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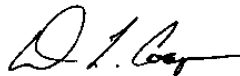
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**APPENDIX A**

<b>Proposed Public Hearings</b>	<b><u>30</u></b>	<b><u>45</u></b>
	<b><u>miles</u></b>	<b><u>miles</u></b>
	Customers	
Branson	1,811	2,343
Brunswick	407	407
Jefferson City	12,690	12,690
Joplin	24,502	24,502
Mexico	4,851	4,851
Riverside	5,722	5,722
Sedalia	784	965
St. Charles	30,477	30,477
St. Joseph	31,847	31,847
St. Louis	336,610	336,610
Warrensburg	<u>7,264</u>	<u>7,264</u>
	456,965	457,678
Beyond Maximum	<u>713</u>	<u>0</u>
	457,678	457,678