

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 ) Case No. WR-2007-0216  
Increase for Water Service Provided in Missouri )  
Service Areas )

**CITY OF JEFFERSON'S PREHEARING BRIEF**

COMES NOW the City of Jefferson City, Missouri (hereinafter sometimes the "City" or the "City of Jefferson"), and submits its prehearing brief in this matter:

Issue(s):

**Are MAWC's Jefferson City facilities adequate as related to back-up power generation, storage and small main replacement?**

As a result of the stipulations approved in Missouri-American Water Company's last rate case, Case No. WR-2003-0500, the Company and the City, with others, engaged in a study of certain Company facilities in the City. The parties eventually filed with the Commission a joint report on their efforts in Case No. WO-2004-0609, a case which had been established by the Commission as a means to receive the joint report. In general, the City is satisfied with the results of the study but since the filing of the report, circumstances have changed somewhat justifying additional attention to matters related to the Company's power sources at the plant site, its treatment capacity and storage capacity, and varying sizes of its transmission mains.

**Back up Power Generation**

Since the last rate case, the Company has taken required steps to address vulnerabilities to its power sources at the plant site. However, the plant lost power from both of its feeder lines in August of 2006 during a major power outage that affected not only the Company's plant but

much of the western and downtown areas of the City. Because the Company relies on high service pumping equipment to distribute water in the Jefferson City system, this total energy loss severely compromised the Company's level of service until power was restored several hours later. To avoid this situation in the future, the City has recommended that the Company acquire permanent back up power generation at the plant site. The Company is already undertaking acquisition of that equipment and it has represented that the same will be installed no later than the end of calendar year 2007. That time frame is acceptable to the City and the Commission should direct the Company to install the facility by that time.

### **Reserve Water Storage**

Also since the last rate case and the joint report submission in Case No. WO-2006-0609, the Company's Jefferson City service area was subject to emergency water restrictions during two consecutive summers. In the summer of both 2005 and 2006, the City imposed by ordinance restrictions on water usage to reduce demand on the Company's system. Weather and demand for water in Jefferson City can be expected to repeat historical patterns. Despite a service territory which will in all likelihood never enlarge geographically, the Company can still expect more demand for water within that territory as development continues and as redevelopment of several high profile projects progresses. Facilities must be improved to avoid or reduce the possibility of imposition of emergency water conservation measures.

The Company is apparently engaged in a comprehensive study of its storage facilities and demand. It has not indicated when the study may be complete and when it will be approved by the Company. The City's position is that sufficient data exists now by which to determine the amount of additional storage which would abate or alleviate the problem, and it has also recommended the prompt construction of storage facilities, whether one or more, sufficient to

hold an additional three million gallons of water available to the Jefferson City service area. The former site of the state's correctional facility is slated for dramatic redevelopment and as part of that process property for water storage use may be more available than it generally is. The City is proposing in this case that the Company be directed to move ahead without delay in the erection of the needed storage facilities.

### **Transmission Mains**

The Company's large mains or transmission mains in the City vary in diameter. For instance, the area along Missouri Boulevard is fed by a 16" feeder line. This 16" line branches to a 10" line that feeds Dunklin Street near St. Mary's Hospital, and an 8" line that goes west along Missouri Boulevard. The 8" line becomes a 12" line at MODOT's Central District facilities. From there the line returns to an 8" line past the Dix Road intersection and reverts to a 12" line near Heisinger Rd. At Stadium Boulevard, the line narrows to 8" again.

The narrower feeders or transmission mains create a "choke point" along the distribution route of the water and cause reductions in water pressure. The development occurring on Missouri Boulevard at this time illustrates that unless the situation is rectified, it will only degrade with time as demand for water continues to increase. The City proposes that the Company be directed to institute a progressive program to replace the narrower feeder mains and perhaps simultaneously study how its transmission grid might be modified to maintain constant reliable pressure without wholesale replacement of the narrower lines.

The Company's comprehensive study now underway includes preparation of a hydraulic model which will help examine to what extent the feeder mains in the Jefferson City service area should be replaced or looped with other transmission lines. The City welcomes the study but argues that the study should be completed and its results ready for review by the end of the year.

The City will pray for orders to those effects.

The City has offered the testimony of Chief Robert Rennick on these issues.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email to all parties of record on this 2nd day of August, 2007.

/s/ Mark W. Comley

Mark W. Comley