

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Missouri-American Water )  
Company’s Request for Authority to )  
Implement a General Rate Increase ) Case No. WR-2011-0337  
for Water and Sewer Service Provided )  
in Missouri Service Area. )

**STATEMENT OF POSITION OF THE CITY OF WARRENSBURG**

The City of Warrensburg (“Warrensburg”) takes no position at this time on any issue except Issue E, Rate Design and Miscellaneous Issues, sub-issues 1 and 2, Cost of Service/Revenue Requirements and Class Cost of Service & Rate Design, respectively. Warrensburg reserves the right to brief and argue any issues based upon the evidence at hearing. The following is Warrensburg’s Statement of Position with respect to Issue E:

**E. Rate Design and Miscellaneous Issues.**

**1. Cost of Service/Revenue Requirements.**

**How should rates be designed in order to collect the revenue requirement from each customer class (i.e., district specific, single tariff or hybrid)?**

Warrensburg recommends that Missouri-American Water Company’s (“MAWC” or “Company”) districts continue to be priced at District-Specific Pricing (“DSP”) and that the Commission reject the Company’s proposal for consolidated tariff pricing.

**Should any district provide a revenue support or subsidy to another district? If so, which districts should receive support and which districts should be required to provide that support?**

Warrensburg supports DSP, which requires prices within a district support the district costs. Therefore, no district subsidy would be necessary.

**Should water service provide a revenue support or subsidy to sewer?**

Warrensburg supports DSP, which requires prices within a district support the district costs. Therefore, no subsidy to sewer operations would be necessary.

**2. Class Cost of Service & Rate Design.**

**What are the proper allocations for costs not directly assigned to a particular system?**

Warrensburg takes no position on this issue at this time.

**What is the appropriate basis upon which to allocate costs to each customer class?**

Warrensburg takes no position on this issue.

**What is the appropriate way to establish the customer charge?**

Warrensburg takes no position on this issue.

**Should the customer charge be uniform across all districts?**

Warrensburg takes no position on this issue at this time.

**Should the commodity charge be set as a declining block rate or should the commodity charge be uniform for all levels of usage?**

Warrensburg takes no position on this issue at this time.

**How should any rate increases or rate decreases resulting from this case be spread or allocated?**

Warrensburg supports an equal percentage increase or decrease across all rate revenues.

WHEREFORE, the City of Warrensburg respectfully submits this Statement of Position.

CURTIS, HEINZ,  
GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was emailed on this 15<sup>th</sup> day of February, 2012 to the attorneys of record on the Commission's service list in this case.

/s/ Leland B. Curtis

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Leland B. Curtis