

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

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 Areas	)		

**UWUA LOCAL 335's STATEMENT OF POSITION**

Comes now Utility Workers Union of America, Local 335 ("UWUA Local 335") and presents its Statement of Position as follows. With regard to the issue of the 42 unfilled jobs in St. Louis County, UWUA Local 335 requests that Commission require MAWC to fill these positions. In addition to these unfilled positions, there are a significant number of individuals in St. Louis County who are currently eligible for retirement or will be eligible for retirement in the near future. Hiring new employees is important so that MAWC does not suffer a "skills gap" upon the retirement of several experienced workers.

With regard to the issue of MAWC's valve exercise program, UWUA Local 335 requests that the Commission order MAWC to engage in semi-annual reporting of the following: (1) the number of employees assigned to its valve program, (2) the number of valves planned to be inspected or maintained in the previous reporting period, (3) the number of valves actually inspected or maintained in the previous reporting period, (4) the number of valves in need of repair or replacement, (5) the date for repair or replacement for damaged valves, and (6) the reasons behind any decision not to repair or replace any damaged valves.

The basis of this request is as follows. In 2007, American Water Company (MAWC's parent) drafted a "Valve Operation, Inspection, and Maintenance Practice" (the "Practice"). This document sets out steps for proper valve exercising, the frequency of maintenance techniques, and data collection practices. Benefits of a valve exercise program, as stated by the Practice, include: (1) providing a faster response to emergency events; (2) minimizing risk of property loss and damages; (3) reducing the cost of repairs/installations; and (4) reducing the impact to customers of service interruptions. MAWC's current program performs valve maintenance primarily in connection with main breaks and main replacement. This practice is insufficient because the purpose of having a comprehensive valve maintenance program is to identify a malfunctioning valve prior to a main break. Finally, the Tennessee Regulatory Authority has required that Tennessee American Water submit to semi-annual reporting on its valve maintenance program.

At this time, UWUA Local 335 takes no position on the remaining issues set out by the parties, reserving however the right to brief and argue any such issues based upon the evidence that unfolds at hearing.

/s/ Michael A. Evans  
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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on February 15, 2012, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Michael A. Evans \_\_\_\_\_