

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

In the Matter of Missouri-American Water)
Company’s Request for Authority to Implement)
General Rate Increase for Water and Sewer)
Service Provided in Missouri Service Areas) Case No. WR-2020-0344

POSITION STATEMENT OF INTERVENOR MUNICIPAL LEAGUE OF METRO ST. LOUIS

COMES NOW the Municipal League of Metro St. Louis, by and through counsel, and offers its position on the following issue identified in the above-captioned matter.

44. Water Rate Design

- a. Single Tariff Pricing / District Specific Pricing – Should the Commission keep the current water district structure, or adopt single tariff pricing for the water customers?

The Municipal League of Metro St. Louis (“the League”) is an association of cities, villages and county governments dedicated to improving the quality of life for residents within the municipalities who are members. Its members represent 98% of the population of St. Louis County and St. Louis City. The present rate case directly affects its constituents.

The League respectfully states and urges that the Commission should maintain the current water district structure (maintenance of a separate St. Louis County district) and reject single tariff pricing for Missouri-American Water Company’s customers.

The League generally agrees¹ with the conclusions on this issue (rejection of single tariff pricing / maintenance of separate districts) expressed in the Direct and Surrebuttal testimony of Geoff Marke on behalf of the Office of the Public Counsel (Dkt. ## 67 & 146) and of Jessica York on behalf of the Missouri Energy Industrial Consumer (Dkt. ## 71 & 150) and with the

¹ The League generally agrees with these conclusions relating to maintenance of a separate St. Louis County district and the rejection of single-tariff pricing solely for the purpose of this proceeding and without waiver of its right to assert at any time its own independent reasoning, later in this proceeding or in any other proceeding, which may differ from these witnesses’ testimony. This filing should not be considered a verbatim adoption of their testimony by the Municipal League of Metro St. Louis.

Staff's recommendation to maintain the separate district structure (Dkt. # 69).

Other Issues

The League takes no position presently on the other identified issues in this proceeding.

Respectfully submitted,

ARMSTRONG TEASDALE LLP

s/ Matthew D. Turner

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**ATTORNEYS FOR INTERVENOR
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ST. LOUIS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been emailed to all parties and/or counsel of record on this 18th day of February, 2021.

s/ Matthew D. Turner

Matthew D. Turner