

**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 ) **File No. WR-2020-0344, et al.**  
Water and Sewer Service Provided in )  
Missouri Service Areas )

**POSITION STATEMENT**  
**OF**  
**PUBLIC WATER SUPPLY DISTRICT NO. 2**  
**OF ANDREW COUNTY**

COMES NOW Intervenor Public Water Supply District No. 2 of Andrew County ("Water District") and, pursuant to the Commission's *Amended List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements*, filed by the Staff on behalf of all of the parties on February 17, 2021, sets forty-five (45) topical issues and sub-issues. The Water District intends to participate in the Water Rate Design portion of the case, in particular, Issue 44. While the Water District will not actively participate in addressing the revenue requirement issues in this proceeding, it requests that the Commission carefully consider the rate impacts that it has absorbed in past cases, and the cost of service study evidence submitted by Staff in this case:

**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?**

**Position:** In MAWC's last rate case, Case No. WR-2017-0285, the Commission found it appropriate to apply an equivalent volumetric rate for Rate B customers for all service areas. *Report and Order*, p. 31, Re Missouri-American Water Company, File No. WR-2017-0285 (May 2, 2018). The Water District recommends that the Commission keep the current water district rate structure for the Rate B which applies to water districts across the state.

- b. **Industrial Class** – Should MAWC create an industrial customer class (Rate L)? Should the Commission eliminate Rate J and begin the migration of customers that do not qualify for a new Rate L to Rate A?

**Position:** The Water District takes no position on this issue.

- c. **Class Costs** –

- i. **What is the appropriate cost of service for each customer class?**

**Position:** The Water District recommends the adoption of the cost of service study included in the Staff’s rate design testimony in this case, as corrected.

- ii. **What is the appropriate methodology for conducting the class cost of service study?**

**Position:** The Water District supports the class cost of service study included in the Staff’s rate design testimony in this case, as corrected.

- d. **Customer Charge** – What is the appropriate customer charge for each customer classification?

**Position:** The Water District recommends that the Commission maintain the current rate structure for Rate B, including the customer charges, adjusted only for the modified revenue requirement.

- e. **Commodity Charge** – What is the appropriate commodity charge for each customer classification?

**Position:** The Water District recommends that the Commission maintain the current rate structure for Rate B, including the commodity charges, adjusted only for the modified revenue requirement.

- f. **Sunnydale Rate Designation** – Should Sunnydale be placed on Rate J, or in the alternative, Rate J1?

**Position:** The Water District takes no position on this issue.

The Water District reserves the right to cross-examine witnesses and to file a post-hearing brief on any issue in this case.

Respectfully submitted,

**/s/ James M. Fischer**

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Attorney for Public Water Supply District  
No. 2 of Andrew County

**CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing document has been e-mailed on this 18th day of February, 2021, to all counsel of record.

**/s/ James M. Fischer**

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James M. Fischer