

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

Linda Beecham,)	
)	
Complainant,)	
)	
v.)	<u>File No. WC-2020-0181</u>
)	
Missouri-American Water Company,)	
)	
Respondent.)	

MISSOURI-AMERICAN’S RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Respondent Missouri-American Water Company (“Missouri-American”), by and through the undersigned counsel, and respectfully states for its *Response to Order Directing Filing* as follows:

1. On August 17, 2020, the Commission directed the parties to file pleadings indicating specifically which information designated confidential in the record they wish to remain confidential, along with the support for such designation.
2. Pursuant to Commission Rule 20 CSR 4240-2.135(2)(A)1., Missouri-American asked during the evidentiary hearing that its Exhibits 200 and 201 be marked Confidential due to certain customer-specific information contained within the exhibits.¹
3. Pursuant to Section 386.480, RSMo, such confidential information is to remain confidential and closed to the public “...except on order of the commission, or by the commission or a commissioner in the course of a hearing or proceeding.” Under Section 386.480, RSMo., the Commission may release information now marked confidential as part of its Report and Order in this matter.

¹ Missouri-American notes that the Attachments contained in Exhibit 201 are publicly available, more specifically, Attachment A was obtained from a search of the Missouri Secretary of State’s website, and the information contained in Attachment C was obtained from a search of the Missouri Department of Health & Senior Services’ website.

4. In regard to the Commission's directive to file pleadings in compliance with Commission Rule 20 CSR 4240-2.135(2)(B) and (10), Missouri-American has attached copies of Exhibits 200 and 201 to this Response with the customer-specific information marked and highlighted. The supporting rule provision is also provided with each confidential marking.

5. As to what information should remain confidential, Missouri-American will defer to the Commission's authority under Section 386.480, RSMo and Commission Rule 20 CSR 4240-2.070(11), as well as the Complainant's position on what other customer-specific information she does not object to releasing as public.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Timothy W. Luft #40506
727 Craig Road
St. Louis, MO 63021
Telephone 314-996-2279
Email: tim.luft@amwater.com

BRYDON, SWEARENGEN & ENGLAND P.C.

By: **/s/ Jennifer L. Hernandez**
Jennifer L. Hernandez #59814
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
Telephone: (573) 635-7166
Facsimile: (573) 635-0427
E-mail: jhernandez@brydonlaw.com

**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing have been transmitted by electronic mail and United States Postal Mail, postage prepaid, to the Complainant, and by electronic mail to all counsel of record this 27th day of August 2020:

Missouri Public Service Commission
Staff Counsel Department
staffcounsel@psc.mo.gov
karen.bretz@psc.mo.gov
mark.johnson@psc.mo.gov

Missouri Office of the Public Counsel
opcservice@opc.mo.gov

Missouri-American Water Company
timothy.luft@amwater.com

Ms. Linda Beecham, Complainant
lbeechem03@aol.com
749 Liberty Village Drive
Florissant, MO 63031

/s/ Jennifer L. Hernandez