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

In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain A Water System in an area of St. Charles County, Missouri.

File No. WA-2016-0054

## MOTION FOR LEAVE TO AMEND APPLICATION

COMES NOW Missouri-American Water Company (MAWC or Company) ), and, as its

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Motion for Leave to Amend Application, states as follows to the Missouri Public Service

Commission's (Commission):

1. On September 4, 2015, MAWC filed an Application and, If Necessary, Motion

for Waiver (Application) requesting a certificate of convenience and necessity to provide water

service in an area of St. Charles County.

2. On September 28, 2015, MAWC filed a Supplement to Application, which

provided Appendix E-HC Supp, as a supplement to the Application.

3. Paragraph 10 of the Application states as follows:

MAWC proposes to provide service at the current flat rate of \$30/month, until MAWC's next rate case, at which time it shall be consolidated with MAWC's St. Louis Metro District for ratemaking purposes.<sup>1</sup> MAWC proposes to utilize the rules and regulations currently applicable to the St. Louis Metro District.

By this Motion for Leave, MAWC seeks to amend Paragraph 10 of the Application by

deleting Paragraph 10 in its entirety and substituting in lieu thereof the following:

MAWC proposes to provide service at the current flat rate of \$40/month, until MAWC's next rate case, at which time it shall be consolidated with MAWC's St. Louis Metro District for ratemaking purposes.<sup>2</sup> MAWC proposes to utilize the

<sup>1</sup> Further, MAWC will need to install meters before the Jaxson Estate customers may be subject to a volumetric rate. 2 Further, MAWC will need to install meters before the Jaxson Estate customers may be subject to a volumetric rate.

rules and regulations currently applicable to the St. Louis Metro District.

4. In pulling together these materials, MAWC confused the sewer rate for the subject area (\$30/month) with the water rate (\$40/month). The proposed amendment will correct this error.

5. Further, MAWC seeks to replace <u>Appendix D-HC</u> attached to the Application (the Feasibility Study), with <u>Appendix D-HC Amended</u>, attached hereto. <u>Appendix D-HC</u> <u>Amended</u> incorporates the rate change identified above, along with changes in estimated expenses that are related to revenues.

6. Commission Rule 4 CSR 240-2.080(18) provides, in part, that a pleading may be amended at any time by leave of the Commission. MAWC asserts that the need to accurately reflect the current rates being charged in this subdivision constitutes good cause for a grant of leave to amend. Moreover, no responsive pleading has yet been filed in this matter. Staff has been ordered to file a recommendation by November 9, 2015. Because approximately two and a half weeks remain until this filing is due, MAWC believes that a grant of the requested leave will not prejudice the parties.

WHEREFORE, MAWC respectfully requests that the Commission issue its order granting MAWC leave to amend its Application as described herein.

Respectfully submitted,

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## ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on October 21, 2015, to the following:

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