

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the Matter of Missouri-American	)	
Water Company's Request for	)	
Authority to Implement a General Rate	)	Case. No. WR-2010-0131
Increase for Water Service Provided	)	
in Missouri Service Areas	)	

**INTERVENOR CITY OF RIVERSIDE'S FIRST SET OF DATA REQUESTS TO  
MISSOURI-AMERICAN WATER COMPANY**

COMES NOW, the City of Riverside, Missouri ("Riverside"), by and through undersigned counsel and pursuant to 4 CSR 240-2.090(2) and this Commission's Order Suspending Tariff, Directing Filings, Setting Conferences and Hearings, and Directing Notice, and submits the following data requests to Missouri-American Water Company (the "Company") concerning its proposed tariff, P.S.C. Mo. No. 9, Original Sheet No. RT 42, Original Sheet No. RT 43, Original Sheet No. RT 44, and Original Sheet No. RT 45 (Platte County) filed in the present proceeding. Riverside is located within the Company's Parkville District (the "Parkville District").

1. Please provide an excel spreadsheet describing in detail the Company's production costs and distribution costs for providing clean water in each of its Missouri water service areas.
2. Please describe in detail the manner in which the Company apportions its production and distribution costs for providing clean water among its Missouri water service areas.
3. Please describe in detail the manner in which the Company determines the amount of its "standby fee."
4. Please describe whether the "standby fee" is assessed against metered lines.
5. Please provide a list describing in detail the Company's monthly and annual maintenance information with respect to fire hydrants located in the Parkville District.

6. Please provide a list describing in detail the annual flow tests performed by the Company for fire hydrants located in the Parkville District.

7. Please provide a current map of the water distribution system in the Parkville District, which differentiates between commercial and residential customers.

8. Please describe in detail the steps taken by the Company to address the deficiencies described in the Riverside Fire Flow Modeling report prepared by the Company, a copy of which is attached hereto as **Exhibit A**.

9. Please provide a final copy of the Riverside Fire Flow Modeling report and any exhibits, amendments, updates, and supplements thereto, as well as any subsequent reports with respect to the subject matter thereof.

10. Please describe in detail the reasons the Company discontinued construction of the 24 inch main/transmission line located in Riverside.

11. Please describe in detail if, and to what extent, the Company's revenue requirement and cost allocation to the Parkville District reflects, accounts for or otherwise anticipates the \$500,000 annual infrastructure investment, each year for five (5) years beginning in 2008, approved by Riverside for water line construction and improvements and subsequent tender of such plant to the Company for operation, maintenance and future revenues. If not so reflected, please describe in detail how such contributions will affect the Parkville District in the future.

Respectfully submitted,

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ATTORNEYS FOR CITY OF RIVERSIDE

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served via the PSC's electronic filing system (EFIS) service list for this case, on this 12th day of March, 2010, and specifically upon the following:

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