

**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.)	

RESPONSE TO ORDER DIRECTING FILING

COMES NOW 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 September 25, 2020, Missouri-American filed the *Affidavit of Tracie Figueroa* (“*Affidavit*”). The *Affidavit* set forth Missouri-American’s 15-year meter change program for 5/8-inch meters based on the results of meter studies conducted since at least 1960. The *Affidavit* set forth the meter study data from studies conducted in 1960, 1968, 1972, 1990, 1995, and 2012 and the studies’ conclusions that Neptune meters meet or exceed meter accuracy standards for at least 15 years.

2. Commission Rule 20 CSR 4240-10.030(38) provides the following for 5/8-inch meters:

Unless otherwise ordered by the commission, each water service meter installed shall be periodically removed, inspected and tested in accordance with the following schedule, **or as often as the results obtained may warrant to insure compliance with the provisions of section (37) of this rule:**

(A) Five-eighths inch (5/8”) meter—ten (10) years or two hundred thousand (200,000) cubic feet whichever occurs first[.]

(emphasis added).

3. Rule 20 CSR 4240-10.030(38) provides two paths for compliance. A water utility can ensure the accuracy of 5/8-inch meters in service by either: (1) testing the meters on the default schedule of 10 years/200,000 cubic feet provided in the rule, or (2) replacing the meters on a schedule supported by the results of meter studies determining the accuracy of meters throughout the service life.

4. Rule 20 CSR 4240-10.030, as it exists today, was filed on May 2, 1968, and became effective May 16, 1968. Since at least 1960, St. Louis County Water Company, and subsequently Missouri-American, has utilized a 15-year meter change program for 5/8-inch meters based on the results of meter studies finding that the meters meet or exceed accuracy standards for at least 15 years.

5. The American Water Works Association recommends that a utility's own test results be used to determine the length of time its meters should remain in service between tests.¹

6. Missouri-American's use of meter studies allows it to analyze utility specific data on accuracy to determine when meters should be replaced, rather than just basing replacement on age or consumption without thought to accuracy. Ultimately, the use of a meter through its entire accurate service life results in cost savings for customers.

WHEREFORE, Missouri-American requests the Commission issue an order finding that Missouri-American has not violated any statute, rule, provision of its Commission-approved tariff or any Commission order in the provision of water service to the Complainant, deny Complainant's request for \$6,000, and for any other relief the Commission finds just and reasonable.

¹ American Water Works Association Manual of Water Supply Practices M6, Water Meters Selection, Installation, Testing, and Maintenance, p. 68.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

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**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has 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 16th day of October 2020.

/s/ Jennifer L. Hernandez