

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

FILED³

AUG 21 2000

Missouri Public
Service Commission

In the Matter of Missouri-American Water)
Company's Tariff Sheets Designed to)
Implement General Rate Increases for)
Water and Sewer Service provided to)
Customers in the Missouri Service Area)
of the Company.)

Case No. WR-2000-281 et al.

Public Counsel Response to Order Directing Filing

COMES NOW the Office of the Public Counsel (OPC) and for its Response to Order Directing Filing states as follows:

1. On August 8, 2000 the Commission issued its Order Directing Filing in which it directed each party to prepare and submit a summary of the financial impact of its position in this case. The Commission asked each party to prepare a scenario depicting the calculation of revenue requirement (deficiency) according to its filed position. The Commission further directed each party to show the rate impact for each class of customer in each district for its revenue requirement and scenario, and further show the impact for each year of any recommended phase-in.
2. Attached hereto is Public Counsel's revenue requirement deficiency recommendation as it is reconciled to the filed positions of Missouri-American Water Company ("Company" or "MAWC"), the Staff of the Commission (Staff), and the Industrial Intervenors. This document includes general notes as well as more detailed annotations that describe where

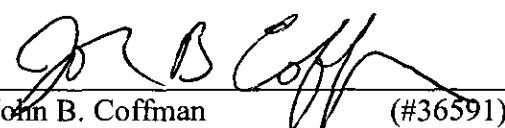
it the record the Commission may find support for each of Public Counsel's issues and explanation of assumptions underlying these numbers.

3. In addition, Public Counsel has attached hereto the requested average water bill comparison for each customer class for each of the seven MAWC districts over each year of Public Counsel's recommended phase-in. This seven page document shows the percentage increase for each class within each district for each year of the recommended phase-in. Support for these calculations can be found in the record at Ex. 27, pp. 8-9, 11; Ex. 28, Sched. JAB R3; Ex. 29, Sched. JAB SR and Ex. 34, Sched. RWT-2-RWT4, RWT-6; Sched. RWT-5 Revised. More detailed information regarding residential rate impacts can be found in Public Counsel's Ex. 78, previously submitted in response to a Commission request.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:


John B. Coffman (#36591)
Deputy Public Counsel
P. O. Box 7800
Jefferson City, MO 65102
(573) 751-1304
(573) 751-5562 FAX

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 21st day of August, 2000:

Keith Krueger
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Louis J. Leonatti
Leonatti & Baker
P.O. Box 758
Mexico, MO 65265

Charles B. Stewart
Stewart & Keevil
1001 Cherry St., Suite 302
Columbia, MO 65201

Leland B. Curtis
Curtis, Oetting, et al.
130 S. Bemiston, Suite 200
Clayton, MO 63105

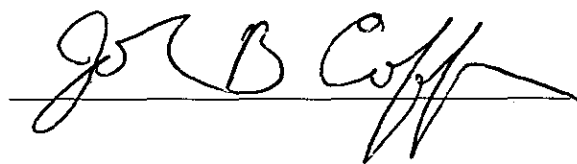
Chuck D. Brown
303 E. Third St.
P.O. Box 1355
Joplin, MO 64802-1355

Joseph W. Moreland
Blake & Uhlig
2500 Holmes Rd.
Kansas City, MO 64108

Stuart W. Conrad
Finnegan, Conrad & Peterson
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

James M. Fischer
101 W. McCarty, Suite 215
Jefferson City, MO 65101

Dean L. Cooper
William R. England, III
Brydon, Swearengen & England
P.O. Box 456
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "J B Coffey", is written over a horizontal line.

Missouri-American Water Company
Case No. WR-2000-281

Reconciliation of the Party's Recommended Revenue Requirement Deficiencies

Description	Total Company Water	Brunswick	Joplin	Mexico	Parkville	St. Charles	St. Joseph	Warrensburg
Company filed request	\$ 16,446,277							
Impact of settled/non-contested issues on Company request	(3,277,563)							
Company revised request	13,168,714	\$ 309,908	\$ (594,665)	\$ 1,441,751	\$ 1,189,389	\$ 595,943	\$ 10,638,184	\$ 586,604
Contested issues:								
Staff:								
AFUDC	(180,711)	0	0	0	0	0	(180,711)	0
Plant capacity	(318,266)	0	0	0	0	0	(318,266)	0
Deferred taxes	(199,098)	(5,052)	0	(27,255)	(25,996)	(113,107)	0	(27,688)
AAO - Post AFUDC and deferred depreciation	(292,629)	0	0	0	0	0	(292,629)	0
Return on equity	(1,729,198)	(8,945)	(204,850)	(121,419)	(89,015)	(266,226)	(943,817)	(94,926)
Staff position before phase-in and uncollectibles	\$ 10,448,812	\$ 295,911	\$ (799,515)	\$ 1,293,077	\$ 1,074,378	\$ 216,610	\$ 8,902,761	\$ 463,990
Industrial Intervenor:								
Plant valuation								
Phase 1	\$ (6,793,768)	\$ 113	\$ 2,851	\$ 1,418	\$ 1,332	\$ 4,646	\$ (6,805,438)	\$ 1,310
Phase 2	1,660,005	(34)	(858)	(427)	(401)	(1,399)	1,663,518	(394)
Phase 3	685,476	(13)	(318)	(159)	(149)	(518)	686,779	(146)
Industrial Intervenor's position	\$ 6,000,525	\$ 295,977	\$ (797,840)	\$ 1,293,909	\$ 1,075,160	\$ 219,339	\$ 4,447,620	\$ 464,760
Public Counsel								
Premature Retirement (1)	\$ (309,148)	\$ 3	\$ 178	\$ 89	\$ 84	\$ 290	\$ (309,874)	\$ 82
Plant valuation (2)	50,149	3	(24)	(12)	(11)	(38)	50,242	(11)
Excess Capacity (3)	(714,269)	14	346	172	161	563	(715,684)	159
ROE	(172,035)	(1,184)	(28,605)	(16,593)	(12,079)	(35,648)	(65,060)	(12,866)
Public Counsel's position	\$ 4,855,222	\$ 294,813	\$ (825,945)	\$ 1,277,565	\$ 1,063,315	\$ 184,506	\$ 3,407,244	\$ 452,124

General Notes to Reconciliation:

Company filing is based on Single Tariff Pricing. Company revised request presented above reflects the Staff's position of District Specific Pricing. Since rate design is a contested issue, the difference between the filed request (by district) and the Company revised request below would not be appropriate to show as a settled/non-contested issue.

Public Counsel plant valuation, as compared to the Staff, is (\$4,398,138). Plant valuation under Public Counsel issues reflect the incremental change from Industrial Intervenor's position.

The value of any individual issue presented may be affected by the other issues. Therefore, the value of any issue, as presented, can not be assumed to stand on its own merits.

The value of any issue listed under a particular party is the incremental value from any preceeding party listed in the reconciliation.

Parenthetical numbers correspond to Annotations that follow this page.

**ANNOTATIONS TO
PUBLIC COUNSEL'S REVENUE REQUIREMENT DEFICIENCY**

1. Premature Retirement—Support for Public Counsel's recommendation that none of the rate base associated with river treatment plant should be included because it is not used and useful is found in the rebuttal and surrebuttal testimony of Public Counsel witness Kimberly Bolin in Exhibits 22 and 23.

This adjustment is appropriate regardless of the valuation recommendation for the St. Joseph water treatment plant that is adopted by the Commission. Public Counsel's recommended valuation for the rate base associated with the new St. Joseph groundwater treatment plant is based upon the cost that could have been incurred to rehabilitate and upgrade the river treatment facility in St. Joseph and includes an appropriate amount of existing rate base that would have remained under such a rehabilitation and upgrade. However, Public Counsel's recommended valuation refers only to the proper amount of new plant should be added to MAWC's rate base (See Annotation 2 below) and is irrelevant to whether any of the river plant is currently used and useful.

2. Plant Valuation--Public Counsel's plant valuation, as compared to the recommendation of Staff, is (\$4,398,138). The plant valuation figure shown under Public Counsel's issues reflects the incremental change from Industrial Intervenor's position.

Public Counsel's valuation is based upon MAWC's own 1991 estimate, submitted to the Missouri Department of Natural Resources, showing what it would have cost to rehabilitate and upgrade the river treatment facility in St. Joseph, updated by Public Counsel witness Ted Biddy to reflect 1998 dollars, plus additional costs that would account for ozone facilities, a new raw water intake, low service pumping equipment, access road improvements and comprehensive flood-proofing completely surrounding the river plant. (\$36,679,775—Ex. 19, p. 21; Ex. 20, pp. 16-17).

In order to develop the appropriate recommendation for the valuation of appropriate water treatment for the St. Joseph district, it is necessary to add Mr. Biddy's cost estimate for rehabilitating, upgrading, and flood-proofing the river treatment plant to the value of the existing rate base (net plant) that would have remained at the river treatment facility (\$1,888,063). (Ex. 33, p.16; Ex. 21, p. 5). The revenue requirement impact of this rate base recommendation including modifications to the "return on" of the plant value as well as the "return of" (i.e., depreciation expense) of the plant value is shown in the testimony and schedules of Public Counsel witness Russell Trippensee (Ex. 33, pp. 16-19; Ex. 35, pp. 15-16, Sched. RWT-5-Revised). The total rate base valuation recommended by Public Counsel is \$38,567,838.

MAWC's 1991 estimate assumed a water plant capacity of 30 MGD, which the record indicates would be excess capacity for the St. Joseph District. No downward

adjustment for excess capacity was included in Public Counsel's valuation recommendation. (See Annotation 3 below).

The flood-proofing cost incorporated into Public Counsel's valuation does not reflect the cost of simply repairing the "french drain" problem at the railroad track (in Mr. Biddy's direct testimony), but in fact, includes the higher cost of \$500,295 for the more extensive flood-proofing solution (in Mr. Biddy's surrebuttal testimony) of increasing the levy to four feet above the 500 year flood level, including a densely compacted earthen structure with an impervious clay core and extending the length of the levy to protect all sides of the river plant, completely surrounding it so as to assuredly render the site flood-proof, protecting it from flooding on all sides, including protection from any flooding that could seep up from the "french drain" under the railroad track behind the plant. (Ex. 20, pp. 17-19).

It is crucial to understand that Public Counsel is not recommending which alternative MAWC should have pursued with regard to upgrading its water treatment in St. Joseph. The manner in which this water company decides to provide safe and adequate water service is largely within the discretion of its management. Missouri statutes do not provide for water companies to request approval for the "siting" of its plants or preapproval of its decision-making. However, the Commission has the solemn responsibility to set rates at a level that is just and reasonable. The Commission should not interfere with the actual management of the utility, but that does not mean that rates should be based upon the cost of an imprudent course of action taken by management. The Commission should never approve rates that are higher than what would be charged based upon the cost of the most prudent and economical alternative. Without such oversight over rates, consumers would be at the mercy of monopoly practices.

3. Excess Capacity—Public Counsel's recommends that the Commission make a "used and useful" capacity adjustment, allowing the Company to recover at this time 80.45% of the valuation amount determined to be prudently invested for the construction of a 30 MGD St. Joseph treatment facility. (Ex. 19, pp. 23-26; Ex. 20, p. 6; Ex. 33, p. 18) This recommendation is independent from all of the other recommendations made by Public Counsel regarding prudence disallowances, cost of service and revenue requirement. This recommendation applies regardless of whether the Commission adopts the valuation recommendation of the Industrial Intervenors, Public Counsel, Staff or MAWC, because all of these recommendations assume the construction of a 30 MGD facility, 19.55% of which is not used and useful at this time.

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Average Water Bill Comparison Year 1

	Residential	Commercial	Industrial	OPA	Resale
Joplin					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	6,000	25,900	739,200	79,700	1,597,300
Average Bill Present	\$ 17.67	\$ 56.57	\$ 923.75	\$ 201.53	\$ 1,863.45
Average Bill Proposed	\$ 17.03	\$ 56.89	\$ 952.18	\$ 189.67	\$ 1,931.33
Percent Increase	-4%	1%	3%	-6%	4%

St. Charles					
Meter Size	5/8"	5/8"	2"	2"	N/A
Average Usage	8,300	40,300	108,800	115,600	
Average Bill Present	\$ 22.16	\$ 84.72	\$ 233.40	\$ 240.84	
Average Bill Proposed	\$ 23.05	\$ 93.06	\$ 245.37	\$ 264.80	
Percent Increase	4%	10%	5%	10%	

St. Joseph					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	5,600	25,300	817,900	75,500	2,804,300
Average Bill Present	\$ 16.89	\$ 55.40	\$ 1,009.93	\$ 175.87	\$ 2,984.16
Average Bill Proposed	\$ 18.09	\$ 64.73	\$ 1,238.64	\$ 211.74	\$ 3,659.59
Percent Increase	7%	17%	23%	20%	23%

Brunswick					
Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Present	\$ 13.37	\$ 18.65	\$ 31.69	\$ 25.88	\$ 507.94
Average Bill Proposed	\$ 13.61	\$ 19.16	\$ 40.02	\$ 32.00	\$ 639.55
Percent Increase	2%	3%	26%	24%	26%

Mexico					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Present	\$ 15.52	\$ 40.54	\$ 982.55	\$ 98.01	\$ 1,926.42
Average Bill Proposed	\$ 16.27	\$ 47.13	\$ 1,207.20	\$ 117.65	\$ 2,345.25
Percent Increase	5%	16%	23%	20%	22%

Parkville					
Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Present	\$ 22.56	\$ 61.07	\$ 74.36	\$ 92.73	\$ 1,963.14
Average Bill Proposed	\$ 25.06	\$ 72.31	\$ 88.06	\$ 111.19	\$ 2,392.83
Percent Increase	11%	18%	18%	20%	22%

Warrensburg					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	5,600	25,800	388,400	94,300	2,509,900
Average Bill Present	\$ 16.89	\$ 56.37	\$ 539.59	\$ 190.28	\$ 2,735.37
Average Bill Proposed	\$ 18.24	\$ 68.62	\$ 619.37	\$ 241.09	\$ 3,534.37
Percent Increase	8%	22%	15%	27%	29%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on true-up revenue requirement

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Average Water Bill Comparison

Year 2

	Residential	Commercial	Industrial	OPA	Resale
St. Joseph					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	5,600	25,300	817,900	75,500	2,804,300
Average Bill Previous Year	\$ 18.09	\$ 64.73	\$ 1,238.64	\$ 211.74	\$ 3,659.59
Average Bill Proposed	\$ 19.83	\$ 74.84	\$ 1,467.41	\$ 244.55	\$ 4,328.46
Percent Increase	10%	16%	18%	15%	18%

Brunswick					
Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 13.61	\$ 19.16	\$ 40.02	\$ 32.00	\$ 639.55
Average Bill Proposed	\$ 14.99	\$ 21.98	\$ 45.73	\$ 37.32	\$ 782.90
Percent Increase	10%	15%	14%	17%	22%

Mexico					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 16.27	\$ 47.13	\$ 1,207.20	\$ 117.65	\$ 2,345.25
Average Bill Proposed	\$ 18.14	\$ 54.39	\$ 1,433.28	\$ 137.41	\$ 2,755.80
Percent Increase	11%	15%	19%	17%	18%

Parkville					
Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 25.06	\$ 72.31	\$ 88.06	\$ 111.19	\$ 2,392.83
Average Bill Proposed	\$ 28.27	\$ 84.90	\$ 102.46	\$ 130.96	\$ 2,802.34
Percent Increase	13%	17%	16%	18%	17%

Warrensburg					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	5,600	25,800	388,400	94,300	2,509,900
Average Bill Previous Year	\$ 18.24	\$ 68.62	\$ 619.37	\$ 241.09	\$ 3,534.37
Average Bill Proposed	\$ 20.41	\$ 80.31	\$ 716.10	\$ 284.10	\$ 4,133.26
Percent Increase	12%	17%	16%	18%	17%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement

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Average Water Bill Comparison Year 3

	Residential	Commercial	Industrial	OPA	Resale
St. Joseph					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	5,600	25,300	817,900	75,500	2,804,300
Average Bill Previous Year	\$ 19.83	\$ 74.84	\$ 1,467.41	\$ 244.55	\$ 4,328.46
Average Bill Proposed	\$ 20.14	\$ 79.45	\$ 1,605.46	\$ 261.10	\$ 4,733.15
Percent Increase	2%	6%	9%	7%	9%

Brunswick					
Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 14.99	\$ 21.98	\$ 45.73	\$ 37.32	\$ 782.90
Average Bill Proposed	\$ 16.66	\$ 25.18	\$ 52.27	\$ 43.44	\$ 950.90
Percent Increase	11%	15%	14%	16%	21%

Mexico					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 18.14	\$ 54.39	\$ 1,433.28	\$ 137.41	\$ 2,755.80
Average Bill Proposed	\$ 20.33	\$ 62.66	\$ 1,695.16	\$ 160.08	\$ 3,233.99
Percent Increase	12%	15%	18%	16%	17%

Parkville					
Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 28.27	\$ 84.90	\$ 102.46	\$ 130.96	\$ 2,802.34
Average Bill Proposed	\$ 31.96	\$ 99.35	\$ 119.01	\$ 153.74	\$ 3,278.56
Percent Increase	13%	17%	16%	17%	17%

Warrensburg					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	5,600	25,800	388,400	94,300	2,509,900
Average Bill Previous Year	\$ 20.41	\$ 80.31	\$ 716.10	\$ 284.10	\$ 4,133.26
Average Bill Proposed	\$ 20.26	\$ 82.68	\$ 737.26	\$ 294.50	\$ 4,306.94
Percent Increase	-1%	3%	3%	4%	4%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement

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Average Water Bill Comparison

Year 4

	Residential	Commercial	Industrial	OPA	Resale
St. Joseph					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	5,600	25,300	817,900	75,500	2,804,300
Average Bill Previous Year	\$ 20.14	\$ 79.45	\$ 1,605.46	\$ 261.10	\$ 4,733.15
Average Bill Proposed	\$ 20.06	\$ 79.13	\$ 1,599.47	\$ 260.12	\$ 4,715.44
Percent Increase	0%	0%	0%	0%	0%

Brunswick					
Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 16.66	\$ 25.18	\$ 52.27	\$ 43.44	\$ 950.90
Average Bill Proposed	\$ 18.65	\$ 28.84	\$ 59.80	\$ 50.47	\$ 1,146.85
Percent Increase	12%	15%	14%	16%	21%

Mexico					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 20.33	\$ 62.66	\$ 1,695.16	\$ 160.08	\$ 3,233.99
Average Bill Proposed	\$ 22.87	\$ 72.09	\$ 1,998.13	\$ 186.08	\$ 3,790.64
Percent Increase	12%	15%	18%	16%	17%

Parkville					
Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 31.96	\$ 99.35	\$ 119.01	\$ 153.74	\$ 3,278.56
Average Bill Proposed	\$ 36.22	\$ 115.91	\$ 138.03	\$ 179.97	\$ 3,832.03
Percent Increase	13%	17%	16%	17%	17%

Warrensburg					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	5,600	25,800	388,400	94,300	2,509,900
Average Bill Previous Year	\$ 20.26	\$ 82.68	\$ 737.26	\$ 294.50	\$ 4,306.94
Average Bill Proposed	\$ 20.20	\$ 82.44	\$ 735.26	\$ 293.63	\$ 4,295.22
Percent Increase	0%	0%	0%	0%	0%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement

OFFICE OF PUBLIC COUNSEL

Average Water Bill Comparison

Year 5

	Residential	Commercial	Industrial	OPA	Resale
St. Joseph					
Meter Size	5/8"	5/8"	2"	2"	2"
Average Usage	5,600	25,300	817,900	75,500	2,804,300
Average Bill Previous Year	\$ 20.06	\$ 79.13	\$ 1,599.47	\$ 260.12	\$ 4,715.44
Average Bill Proposed	\$ 19.04	\$ 75.03	\$ 1,520.44	\$ 247.28	\$ 4,481.71
Percent Increase	-5%	-5%	-5%	-5%	-5%

Brunswick					
Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 18.65	\$ 28.84	\$ 59.80	\$ 50.47	\$ 1,146.85
Average Bill Proposed	\$ 19.70	\$ 30.98	\$ 64.50	\$ 54.86	\$ 1,297.03
Percent Increase	5%	7%	7%	8%	12%

Mexico					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 22.87	\$ 72.09	\$ 1,998.13	\$ 186.08	\$ 3,790.64
Average Bill Proposed	\$ 24.85	\$ 79.74	\$ 2,264.57	\$ 207.71	\$ 4,281.91
Percent Increase	8%	10%	12%	10%	11%

Parkville					
Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 36.22	\$ 115.91	\$ 138.03	\$ 179.97	\$ 3,832.03
Average Bill Proposed	\$ 40.96	\$ 134.39	\$ 159.29	\$ 209.37	\$ 4,459.22
Percent Increase	12%	14%	13%	14%	14%

Warrensburg					
Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	5,600	25,800	388,400	94,300	2,509,900
Average Bill Previous Year	\$ 20.20	\$ 82.44	\$ 735.26	\$ 293.63	\$ 4,295.22
Average Bill Proposed	\$ 19.46	\$ 79.27	\$ 709.13	\$ 282.29	\$ 4,142.07
Percent Increase	-4%	-4%	-4%	-4%	-4%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement

OFFICE OF PUBLIC COUNEL

Average Water Bill Comparison

Year 6

Residential Commercial Industrial OPA Resale

Brunswick

Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 19.70	\$ 30.98	\$ 64.50	\$ 54.86	\$ 1,297.03
Average Bill Proposed	\$ 19.44	\$ 30.58	\$ 63.70	\$ 54.12	\$ 1,280.74
Percent Increase	-1%	-1%	-1%	-1%	-1%

Mexico

Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 24.85	\$ 79.74	\$ 2,264.57	\$ 207.71	\$ 4,281.91
Average Bill Proposed	\$ 24.51	\$ 78.65	\$ 2,234.40	\$ 204.81	\$ 4,225.63
Percent Increase	-1%	-1%	-1%	-1%	-1%

Parkville

Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 40.96	\$ 134.39	\$ 159.29	\$ 209.37	\$ 4,459.22
Average Bill Proposed	\$ 40.38	\$ 132.44	\$ 156.98	\$ 206.24	\$ 4,397.52
Percent Increase	-1%	-1%	-1%	-1%	-1%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement

OFFICE OF PUBLIC COUNSEL**Average Water Bill Comparison****Year 7****Residential Commercial Industrial OPA Resale****Brunswick**

Meter Size	5/8"	5/8"	1"	5/8"	2"
Average Usage	3,800	6,500	10,700	10,200	359,500
Average Bill Previous Year	\$ 19.44	\$ 30.58	\$ 63.70	\$ 54.12	\$ 1,280.74
Average Bill Proposed	\$ 16.06	\$ 25.24	\$ 53.29	\$ 44.40	\$ 1,066.21
Percent Increase	-17%	-17%	-16%	-18%	-17%

Mexico

Meter Size	5/8"	5/8"	2"	5/8"	2"
Average Usage	4,900	17,700	792,900	47,100	1,654,800
Average Bill Previous Year	\$ 24.51	\$ 78.65	\$ 2,234.40	\$ 204.81	\$ 4,225.63
Average Bill Proposed	\$ 20.08	\$ 64.31	\$ 1,838.50	\$ 166.74	\$ 3,487.12
Percent Increase	-18%	-18%	-18%	-19%	-17%

Parkville

Meter Size	5/8"	5/8"	5/8"	5/8"	3"
Average Usage	8,500	28,200	35,000	44,400	1,668,000
Average Bill Previous Year	\$ 40.38	\$ 132.44	\$ 156.98	\$ 206.24	\$ 4,397.52
Average Bill Proposed	\$ 32.63	\$ 106.50	\$ 126.25	\$ 164.60	\$ 3,576.67
Percent Increase	-19%	-20%	-20%	-20%	-19%

Assumptions

- * This assumes no change in meter charge
- * All classes in all districts are based on usage in thousand gallons
- * Based on Company provided average bills and usage
- * Based on trued-up revenue requirement