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July 17, 2000

FILED²
JUL 17 2000
Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

**RE: Missouri-American Water Company - Consolidated Case Nos. WR-2000-281
and SR-2000-282**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of MAWC's Response to OPC's Motion to Open Investigation Regarding Water Quality. Please stamp the enclosed extra copy "filed" and return same to me.

Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Dean Cooper
Dean L. Cooper *by Rg*

DLC/rhg
Enclosures

cc: Office of the Public Counsel
Mr. Keith Krueger
Ms. Shannon Cook
Ms. Diana M. Vuylsteke
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Mr. Leland Curtis
Mr. Brent Stewart
Mr. James Duetsch

Mr. Joseph Moreland
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Mr. Louis Leonatti
Mr. Jim Fischer
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**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

FILED³
JUL 17 2000
Missouri Public
Service Commission

In the Matter of Missouri-American)	
Water Company's Tariff Sheets Designed)	
to Implement General Rate Increases for)	Case No. WR-2000-281
Water and Sewer Service provided to)	Case No. SR-2000-282
Customers in the Missouri Service Area)	
of the Company.)	

**MAWC'S RESPONSE TO OPC'S MOTION TO
OPEN INVESTIGATION REGARDING WATER QUALITY**

COMES NOW Missouri-American Water Company ("MAWC") and, in response to the Office of the Public Counsel's ("OPC") Motion to Open Investigation Regarding Water Quality, states the following to the Missouri Public Service Commission ("Commission"):

1. On July 7, 2000, the OPC filed its Motion to Open Investigation Regarding Water Quality. This motion cites to several items of public testimony provided at the St. Joseph local public hearing. It also cites to "telephone calls, letters, faxes and electronic messages" some of which have not previously been a part of the record. The OPC goes on to request that the Commission "issue its Order establishing a separate case for the purpose of investigating the quality of water being provided to MAWC's customers in the St. Joseph operating district. . . ."

2. As was stated by MAWC witnesses Young and Amman at the evidentiary hearing in this matter, MAWC believes that it is addressing the issues raised by its St. Joseph customers. Several adjustments have been made at the new treatment plant in response to comments that have been received from customers. However, MAWC would like to make it clear that while the change of the source of supply and of the treatment processes with the new treatment plant coming on line have created some aesthetics issues, the safety of MAWC's customers has never been jeopardized as the water has continuously met the standards established for such drinking water.

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3. This having been said, MAWC would like to take the opportunity to directly address in a separate docket the concerns and misconceptions that have developed since the new St. Joseph treatment plant was brought on line.¹ Consequently, MAWC does not oppose the OPC's request for the establishment of a docket to study the quality of the water provided to MAWC's St. Joseph district. Such a process would likely be of informational benefit to both the Commission and the public. At this time, MAWC will take the opportunity to discuss the water quality concerns raised by the OPC's motion and the adjustments MAWC has made in response.

WATER QUALITY AND TREATMENT

4. St. Joseph customers have continued to receive water that has met or exceeded Safe Drinking Water standards during the conversion from the old plant to the new plant. (Amman, Tr. 1451-1452, 1470-1471; Young, Tr. 1341-1342). In fact, the drinking water being produced at the new St. Joseph treatment plant and related facilities not only meets all current standards, it also meets all proposed drinking water standards established by the Environmental Protection Agency.

5. Some of the complaints received from customers have concerned aesthetics rather than safety standards. At the time the new facility was place into service, MAWC received several initial complaints concerning taste. MAWC attributes some of this to the blending of the waters from both the old and new facilities in the distribution system that took place when the new system was placed in service, as well as the change in the water supply. The blending effect has since been reduced as the remaining water from the old treatment plant has worked its way

¹ Misconceptions actually began to arise earlier than this as MAWC received some complaints about the taste of the "new" water before the plant was even brought on line.

out of the system.

6. Time will also help some of taste issues in another way. It is the experience in the American system that a person's taste preference generally depends upon what water a person is used to drinking. MAWC witness Young explained during the evidentiary hearing that his experience in starting up treatment plants leads him to believe that there is always a period of time that is required to allow people get accustomed to a change of water supply. (Young, Tr. 1287).

7. Probably the most common comments, such as those about the film and residue, relate to the hardness of the water at the new facility. The source water for the new facility comes from wells, which have a higher Total Hardness than the water formerly taken from Missouri River. Total Hardness is composed of naturally occurring minerals found in water. These minerals, primarily calcium and magnesium, when heated in water have a tendency to precipitate or come out of the solution. When this occurs, the calcium and magnesium will form a thin film on hot beverages or even adhere to surfaces such as pots, dishes, glasses and bath tubs and plumbing fixtures. This condition also becomes apparent when water is allowed to dry on these surfaces leaving some spots. In coffee or tea, these minerals will combine with the natural oils causing a film that has an oily appearance (Amman, Tr. 1469-1470). The oils are naturally found in coffee or tea but are not readily apparent due to the oils being dispersed uniformly throughout the beverage.

8. When MAWC first pumped water from the wells, it saw hardness levels of 500 to 600. The hardness levels have come down as the facility has done more pumping. They have now come down to at least within 20% of the hardness levels of the river. (Young, Tr. 1285-1286). Hardness in the wells has dropped closer to the levels that were expected when the plant

came on line. (Amman, Tr. 1454).

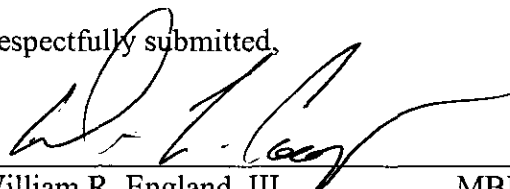
9. Working with a new plant is an ongoing process of making changes in response to water quality and known conditions in the treatment system. (Amman, Tr. 1464). Thus, in addition to the natural softening of the source of supply, MAWC has begun adding a blended phosphate to the water to help reduce the conditions caused by the elevated mineral hardness (Amman, Tr. 1465; Young, Tr. 1287). In essence, the phosphates combine with these minerals and form a complex, which sequesters and stabilizes these minerals, thus reducing their undesirable characteristics such as spotting and the forming of films.

10. Also, to further insure the Total Hardness no longer is an issue for MAWC's customers, the new St. Joseph treatment facility has continued to modify the water treatment at this facility (Amman, Tr. 1453-54). Additional modifications will result in reductions in the mineral content of the water being provided from this facility. The eventual goal is to achieve a hardness level at least equivalent to that of the river.

11. Another common question has concerned the change in the disinfection practices implemented at the new treatment facility. The current method of disinfection maintains a chloramine residual instead of a free chlorine residual in the distribution system. Chloramines are simply a combination of chlorine and ammonia, which forms a compound that is very stable and free of any taste or odor. Because of these unique characteristics, disinfectant residuals can be maintained at a higher level thus insuring the quality and the integrity of the water delivered to MAWC's customers. The notice of this change was provided to St. Joseph customers at least a month in advance of the new facility's changing from chlorine to chloramines in the distribution system. An information brochure detailing chloramines was mailed to all the customers to inform them of this change.

WHEREFORE, MAWC does not oppose the OPC's motion and establish a separate case for investigating the quality of water being provided to MAWC's customers in its St. Joseph operating district.

Respectfully submitted,



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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 17th day of July, 2000, to the following:

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