# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of Missouri-American Water | ) |                       |
|--|---|-----------------------|
| Company's Request for Authority to       | ) |                       |
| Implement a General Rate Increase for    | ) | Case No. WR-2011-0337 |
| Water and Sewer Services Provided in     | ) |                       |
| Missouri Service Areas.                  | ) |                       |

### STATEMENT OF POSITION

The City of Joplin takes a position on only Issue E in the Joint Issues List. For its Position Statement, Joplin states:

## E. Rate Design and Miscellaneous Issues

## 1. Cost of Service/Revenue Requirements

How should rates be designed in order to collect the revenue requirement from each customer class (i.e., district specific, single tariff or hybrid)?

Should any district provide a revenue support or subsidy to another district? If so, which districts should receive support and which districts should be required to provide that support?

Should water service provide a revenue support or subsidy to sewer?

#### **Statement of Position:**

The City of Joplin endorses the principle of cost causation in setting rates, and asserts that district specific pricing is the only method supported by the evidence in this case.

WHEREFORE, the City of Joplin respectfully submits its Statement of Position.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

Marc H. Ellinger, #40828

Thomas R. Schwarz, Jr., #29645

308 East High Street

Suite 301

Jefferson City, MO 65101 Telephone No.: (573) 634-2500

Facsimile No.: (573) 634-2308 E-mail: mellinger@bbdlc.com

E-mail: tschwarz@bbdlc.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing Statement of Position were sent to each of the following parties of record via electronic transmission this 15<sup>th</sup> day of February, 2012:

Lewis Mills opcservice@ded.mo.gov
Office of General Counsel
Rachel Lewis Rachel.lewis@psc.mo.gov

William Steinmeier wds@wdspc.com

Dean Cooper dcooper@brydonlaw.com
Stuart Conrad stucon@fcplaw.com
Curtis Leland lcurtis@lawfirmemail.com
R.W. England trip@brydonlaw.com

Lisa Gilbreath lisa.gilbreath@snrdenton.com
Karl Zobrist karl.zobrist@snrdenton.com
Michael Evans mevans@hammondshinners.com

Larry Dority lwdority@sprintmail.com
John J. Reichart john.reichart@amwater.com

James Fischer jfischerpc@aol.com

Lisa Langeneckert llangeneckert@sandbergphoenix.com

Mark W. Comley comleym@ncrpc.com

Joseph Bednar jbednar@spencerfane.com

Eric Steinle esteinle@spencerfane.com

Craig S. Johnson cj@cjaslaw.com

Byron E. Francis bfrancis@armstrongteasdale.com
J. Kent Lowry klowry@armstrongteasdale.com
Diana M. Vuylsteke
dmvuylsteke@bryancave.com

Thomas R. Schwarz, Jr.