

**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) File No. WR-2015-0301
Water and Sewer Service Provided in)
Missouri Service Areas)

**INTERVENOR CITY OF RIVERSIDE’S STATEMENT OF POSITIONS ON THE
ISSUES**

COMES NOW Intervener City of Riverside Missouri, by and through counsel, and for its *Statement of Positions on the Issues*¹, states their position on the following limited issues:

44. Water Rate Design

a. Single Tariff Pricing / District Specific Pricing – Should the Commission keep the current water district structure, or adopt single tariff pricing for the water customers?

b. Industrial Class – Should MAWC create an industrial customer class (Rate L)? Should the Commission eliminate Rate J and begin the migration of customers that do not qualify for a new Rate L to Rate A?

c. Class Costs –i. What is the appropriate cost of service for each customer class? ii. What is the appropriate methodology for conducting the class cost of service study?

d. Customer Charge – What is the appropriate customer charge for each customer classification?

¹ Based on the *Amended Joint List of Issues*, etc filed on February 17, 2021.

e. Commodity Charge – What is the appropriate commodity charge for each customer classification?

The Commission should consolidate districts in order to protect the true residential rate payer. A just and reasonable design would take that into consideration and establish a specific rate class for the true residential ratepayer who is responsible for paying their individual water bill. In addition to the unjust and unreasonable situation the true residential ratepayers experience due to the current rate design as to customer classes, it is aggravated by the rate design philosophy of “district specific rate making”. It is unjust and unreasonable for a resident to pay a differential of over 100% for his water just because he lives in a particular area.

Wherefore the City of Riverside reserves its right to modify its position on these or any other issue raised in the case.

Respectfully submitted,

SPENCER FANE LLP

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Intervenor City of Riverside’s Statement of Positions on the Issues to Missouri-American Water Company was sent by e-mail this 18th day of February, 2021, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Joseph P. Bednar, Jr.
Joseph P. Bednar, Jr.