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

In the Matter of the Application of Missouri-American	)	
Water Company for a Certificate of Convenience and	)	
Necessity Authorizing it to Install, Own, Acquire,	)	Case No. WA-2021-0376
Construct, Operate, Control, Manage and Maintain a	)	
Water System and Sewer System in and Around the	)	
City of Eureka, Missouri	)	

## MAWC RESPONSE TO NOTICE OF PROPOSAL TO ADMIT EXHIBIT

**COMES NOW** Missouri-American Water Company (MAWC or Company) and, in response to the Missouri Public Service Commission's (Commission) *Notice of Proposal to Admit Uniform Standards of Professional Appraisal Practice as an Exhibit and Order Establishing Time to Respond* (Notice of Proposal to Admit Exhibit), states as follows:

- 1. On March 31, 2022, the Commission issued its *Notice of Proposal to Admit Exhibit*, wherein it proposed to admit into evidence as confidential Commission Exhibit 302 the 2020-2021 Edition of the Uniform Standards of Professional Appraisal Practice, published by The Appraisal Foundation, and directed that any objections to the admission of Exhibit 302 be filed no later than April 7, 2022.
- 2. MAWC has no objection to the admission of Exhibit 302. Section 393.320, RSMo specifically references the Uniform Standards of Professional Appraisal Practice (USPAP). Moreover, MAWC witness Joseph E. Batis, a certified appraiser, has cited to USPAP compliance extensively in his Direct Testimony and Surrebuttal Testimony, as well as during cross-

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<sup>&</sup>lt;sup>1</sup> M. Batis is a certified general appraiser under Chapter 339 of the Missouri Code, holding the Real Estate Appraiser – General Certification. (Exh. 3, Batis Dir., p. 4; Exh. 4, Batis Sur., p. 5). Additionally, Mr. Batis hold the MAI designation from the *Appraisal Institute*. (Exh. 4, Batis Sur., p. 5). Mr. Batis also holds the AI-GRS designation from the *Appraisal Institute*. (*Id*.). The AI-GRS designation is conferred upon members of the Appraisal Institute that have demonstrated, through experience and education, a proficiency in the area of developing appraisal reviews. (*Id*. at pp. 5-6).

examination. MAWC is not aware of any testimony from a certified appraiser that criticizes the appraisal that is the subject of this case. (See Tr. 257 (Gateley)).

WHEREFORE, MAWC respectfully requests the Commission consider this filing and issue such orders as it should find to be reasonable and just.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this  $7^{th}$  day of April, 2022, to:

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