BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

RESPONSE TO ORDER DIRECTING APPLICANT TO SUPPLEMENT APPLICATION

COMES NOW Missouri-American Water Company ("MAWC" or "Company"), by and through the undersigned counsel, and, in response to the *Order Directing Applicant to Supplement Application*, states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On December 29, 2021, the Commission issued its *Order Directing Applicant to Supplement Application*, wherein, among other things, it stated that "[i]n reviewing the documents filed in this matter, the Commission does not find any Flinn Engineering reports. The Commission will order that any and all versions of the report be filed."
- 2. The Flinn Report utilized by the appraisers is found in Schedule BWL-2 of the Direct Testimony of Brian W. LaGrand (Item 18 in EFIS). An explanation of the origin of that document, a second copy of that report and a copy of the prior version, and a statement as to the existence of no other versions of the report is also found within Schedule BWL-3 of the Direct Testimony of Brian W. LaGrand (Item 18 in EFIS). Further, the Flinn Report used by the appraisers is also found as Schedule KES-1 to the Direct Testimony of Kelly Simpson (Item 23 in EFIS). Both testimonies have been provided under affidavit of the respective witness.

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WHEREFORE, Missouri-American Water Company requests that the Commission accept this response to the *Order Directing Applicant to Supplement Application*; and, grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

Dean L. Cooper

Mo. Bar 36592

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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 30th day of December, 2021, to:

General Counsel's Office <u>staffcounselservice@psc.mo.gov</u> Karen.Bretz@psc.mo.gov Office of the Public Counsel opcservice@opc.mo.gov

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