

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

In the Matter of Missouri-American Water)
Company Application for a Certificate)
Of Convenience and Necessity Authorizing)
It to Install, Own, Acquire, Construct,)
Operate, Control, Manage and Maintain)
A Water System and Sewer System in and)
Around the City of Wood Heights, Missouri)
File No. WA-2023-0345

RESPONSE TO STAFF RECOMMENDATION

COMES NOW Missouri-American Water Company (“MAWC”) and for its *Response to Staff Recommendation* states as follows to the Missouri Public Service Commission (“Commission”):

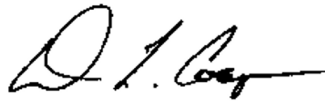
1. On April 5, 2023, MAWC filed an *Application and Motion for Waiver* requesting authority from the Commission to purchase the water and sewer utility assets of the City of Wood Heights, Missouri, and permission, approval and a Certificate of Convenience and Necessity (“CCN”) to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems for the public in an area in and around the City of Wood Heights, Missouri.
2. On April 24, 2023, the Commission issued its *Order Directing Filing* (“Order”). The *Order* directed Staff to file its Recommendation, or an alternative pleading, no later than May 24, 2023.
3. On May 24, 2023, Staff filed its *Staff Recommendation* and supporting *Memorandum*. The *Staff Recommendation* and *Memorandum* recommended the Commission grant MAWC a CCN with the conditions and actions described in Staff’s *Memorandum*, and stated the requested CCN is necessary and convenient for the public service.

4. MAWC has reviewed the proposed conditions and actions listed on pages 11 through 12 of Staff's *Memorandum* and states that it has no objection to the proposed conditions and actions.

5. Also, MAWC notes that while the application in this case was filed on April 5, 2023, the underlying steps have been underway since 2021. As a result, the Wood Heights appraisal process predates the Commission's decision, and much of the adjudication process, in Case No. WA-2021-0376 (MAWC's purchase of the City of Eureka system, wherein several matters associated with appraisals were discussed). For example, the Wood Heights appraiser selection process took place in 2021, the site visit was on November 29, 2021, and the appraisal was completed in early March of 2022. The Eureka case was tried on January 20-21, 2022, and May 6, 2022, and the *Report and Order* was issued on June 9, 2022. MAWC's appraisal processes since the conclusion of the Eureka case have been modified to address some of the Staff concerns raised in the Eureka matter.

WHEREFORE, MAWC requests the Commission issue an order approving MAWC's *Application and Motion for Waiver* and granting MAWC a CCN as recommended in Staff's *Memorandum*, and for such other and further relief as deemed appropriate in the circumstances.

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 was sent by electronic mail to all counsel of record this 31st day of May 2023.