

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

In the Matter of an Investigation of)
Missouri-American Water Company)
With Respect to Certain Issues Disclosed)
During the Recent Rate Case.)

Case No. WO-2017-

JOINT MOTION TO OPEN INVESTIGATION

COME NOW Missouri-American Water Company (“MAWC”) and the Staff of the Missouri Public Service Commission and hereby jointly move the Commission to open an investigation into certain matters disclosed during the recent rate case, Case No. WR-2015-0301, to-wit: a number of faulty water meters and the practice of maintaining negative reserve balances. In support whereof, the Movants state:

Introduction:

1. On May 15, 2015, MAWC filed its *Notice of Intended Case Filing* establishing Case No. WR-2015-0301 and, thereafter, on July 31, 2015, filed its proposed revised tariffs and minimum filing requirements seeking a general rate increase for water and sewer service provided in its Missouri service areas of \$51.0 million on an annual basis, a 19.6% increase. With the existing Infrastructure System Replacement Surcharge taken into consideration, the increase MAWC sought was about 9.73%.

2. Pursuant to ongoing negotiations, the Movants entered into a *Non-unanimous Revenue Requirement Stipulation and Agreement* (“the *Stipulation*”), which was presented to the Commission¹ as a resolution of many of the issues

¹ Filed on March 16, 2016.

presented by Case WR-2015-0301, to which no party objected, and which the Commission approved and directed the signatories to comply with.²

3. Paragraph 11 of the *Stipulation* provides:

FAULTY METERING AND NEGATIVE RESERVE BALANCES:

The parties will jointly request the Commission open investigatory dockets regarding the faulty metering and negative reserve balances issues; MAWC will participate and cooperate fully in these investigations.

4. This case represents the investigatory dockets referred to in Paragraph 11 of the *Stipulation*.

WHEREFORE, the Joint Movants pray that the Commission will open an investigatory docket as described herein.

Respectfully submitted,

/s/ Kevin A. Thompson

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² *In the Matter of Missouri-American Water Company*, Case No. WR-2015-0301 (**Order Approving Non-Unanimous Stipulation and Agreement**, issued April 6, 2016, and **Order Approving Modification to Approved Stipulation and Agreement Regarding Revenue Requirement**, issued May 11, 2016).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this 7th day of July, 2016.

/s/ Kevin A. Thompson