

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

In the Matter of a Working Case to Consider a)
Proposed Residential Customer Disconnection)
Data Reporting Rule)

File No. AW-2020-0148

COMMENTS OF MISSOURI-AMERICAN WATER COMPANY

COMES NOW Missouri-American Water Company (“MAWC”), by and through the undersigned counsel, and hereby provides the following comments to the Missouri Public Service Commission (“Commission”):

1. On November 25, 2019, the Office of the Public Counsel (“OPC”) filed its *Motion to Open a Working Group Docket Regarding a Proposed Residential Customer Disconnection Data Reporting Rule*. Thereafter, on December 11, 2019, the Commission issued its *Order Opening a Working Case to Reconsider a Proposed Residential Customer Disconnection Data Reporting Rule*, wherein the Commission directed that “any stakeholder wishing to submit written comments regarding the rule proposed by the Office of the Public Counsel, or the cost to comply with that rule, . . . do so no later than February 14, 2020.”

GENERAL COMMENT

2. While the OPC Memorandum in support of its Motion provides a good summary of what aggregated disconnection/connection information is, and is not, readily available to the OPC today, it would be helpful for MAWC to understand what benefit will be provided by monthly provision of the aggregated information called for by the proposed rule. Moreover, before any such rule is promulgated, the Commission should examine the individual types of aggregated information sought in order to insure that there is a regulatory purpose for the collection and provision of such information.

PROPOSED RULE PROVISIONS

3. In response to the rule proposed by the OPC, MAWC provides the following comments and questions:

- (1)(I) – Reconnection is said to mean “provision of utility services . . . that had previously ceased receiving the utility’s services” Would this include temporary cessation of service as the result of a line break or scheduled main replacement project, or is it only directed at involuntary and voluntary disconnections? As written, it appears to be the former.
- (1)(H), (1)(M) – Both of these provisions refer to cessation completed either “remotely,” or by physical disconnection. Cessation and physical disconnection are not always the same. An individual customer may cease service with MAWC without a physical disconnection taking place. Depending on the intended use of this information, these categories may need to be separated.
- (2) – The provision calls for a report to be filed “within fifteen (15) days of the end of the month.” It may be helpful to change the phrase to state “within fifteen (15) days after the last day of the month.”
- (2)(C) – This provision calls for a number of accounts that “ceased receiving the utility’s service at least once during the month.” Similar to the above, would this include temporary cessation of service as the result of a line break or scheduled main replacement project, or is it only directed at involuntary and voluntary disconnections? As written, it appears to be the former.

- (2)(G) – The provision asks for the total number of accounts that were reconnected at least once during the month. As a result of (1)(I), it is not clear what circumstances this is meant to encompass.
- (2)(H) and (2)(I) (connections a month after voluntary disconnections and reconnections the month following involuntary disconnections) – MAWC believes that it does not have the capacity at this time to gather this information. Additional administrative staffing and time would be required to produce and review this information.
- (2)(J) – This provision asks for accounts that “began receiving service for the first time during the month.” Is this intended to capture new construction only? As written, it appears to not capture a structure that may have been vacant for an extended period of time, but did, at one point, receive service.
- (2)(L) – This provision asks for the number of accounts “for which there existed at least one delinquent charge as of the last day of each month.” Producing this information would require additional administrative staffing and time to produce and review the information.
- (2)(R) and (2)(S) – Both of these provisions seek “monies received for payment of delinquent charges that was received from any person or legal entity that is not the customer responsible for payment of the delinquent charge. . . .” MAWC believes that it would be impossible for it to determine this information because it is not information that is maintained by MAWC, or which it could easily track. For example, in order to determine whether a customer’s uncle paid their

delinquent bill, MAWC would have to note the payor on every individual check received by the Company.

- (4)(B) – This provision calls for any request for an extension of the submission deadline to be provided to “all parties of record in pending cases before the commission where the utility’s activities are the primary focus of the proceedings.” This requirement is overly broad for the purpose. Such a requirement, at a given time, can capture a large number and variety of parties, many of whom will have no interest in such an extension request. For example, it is doubtful that each customer complainant needs or wants to be served with such a request. Given the likely parties of interest, it would seem that service on the Staff of the Commission and the OPC would be more appropriate and most efficient.
- (6) – It appears that the references to “Disconcertion” should perhaps be “Disconnection.”

4. Lastly, MAWC would find it helpful to see a sample of the report envisioned by this rule. That sample would provide additional information that would be helpful for the Company to determine what steps would be necessary to comply.

COST OF PROPOSED RULE

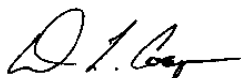
5. MAWC believes that compliance with the proposed rule as written would require a one-time cost for reprogramming of data systems and information collection processes. MAWC would not be able to determine the cost of such reprogramming until the final reporting requirements were known. On an ongoing basis, it is anticipated that

MAWC would need one additional full time equivalent employee to address the administrative tasks associated with compiling and filing the required reports.

WHEREFORE, Missouri-American Water Company submits its Comments for the Commission's information and consideration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to the following on this 14th day of February, 2020:

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