

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

In the Matter of a Proposed Rulemaking)
to Promulgate a New Rule Regarding a) File No. AX-2023-0175
Residential Customer Disconnection)
Data Reporting Rule)

**MISSOURI-AMERICAN WATER COMPANY'S
COMMENTS ON PROPOSED RULE 20 CSR 4240-13.075**

Comes now Missouri-American Water Company (“MAWC” or “Company”) and files its Comments on Proposed Rule 20 CSR 4240-13.075 and in support states as follows:

1. On June 16, 2023, the Missouri Public Service Commission (“Commission”) issued a Notice of Rulemaking Order setting the last date to file written comments as July 15, 2023 and setting a hearing for July 20, 2023.
2. MAWC does not oppose the adoption of a new regulation to provide this disconnection information and appreciates the opportunity to provide comments on this Proposed Rule.
3. MAWC believes it would be simpler to seek monthly information on each of the items included in the proposed rule on a first or last day of the month rather than “00:00” or “24:00” use the first calendar day of the month or last calendar day of the month.
4. MAWC has concerns about its ability to provide all of the requested information based on the systems it uses to gather, the data the system tracks, and the ability to separately report on multiple service types. Therefore, MAWC suggests adding a provision within this Proposed Rule that allows the Commission to waive certain requirements for good cause to address this concern. This would allow utilities the opportunity to demonstrate to the Commission a need for any such waiver.

5. Section 2(L) “any other information the commission orders the utility to provide” is overly broad and duplicative. The Commission has authority to order a utility to act and provide information, and a utility is required to follow Commission orders. Therefore, this section of the Proposed Rule is unnecessary and duplicative.
6. 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 MAWC asks the Commission to accept these Comments and any such relief the Commission deems appropriate.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail on July 14, 2023 to the following:

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