

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

In the Matter of Missouri-American Water)	
Company for Certificates of Convenience and)	
Necessity Authorizing it to Install, Own, Acquire,)	
Construct, Operate, Control, Manage, and)	Case No. WA-2017-0181
Maintain Water and Sewer Systems in and)	
Around the Village of Wardsville, Missouri.)	

**MOTION REQUESTING ORDER DIRECTING MISSOURI-AMERICAN WATER
COMPANY TO FILE STATEMENT INDICATING ITS TREATMENT OF ANY
ACQUISITION ADJUSTMENT AND SUGGESTIONS IN SUPPORT**

COMES NOW the Missouri Office of Public Counsel (“OPC”), by and through undersigned counsel, and files this motion requesting that this Commission issue an Order directing Missouri-American Water Company (“MAWC”) to file a statement reflecting its position as to the treatment of any acquisition adjustment so the Commission may properly consider all relevant factors as required by *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994) and *State ex rel. AG Processing, Inc. v. PSC*, 120 SW3d 732 (Mo. 2003). In support thereof, OPC states as follows:

1. The Public Service Commission Staff (“Staff”) filed a recommendation in the above-captioned matter on March 13, 2017 with an attached Official Case File Memorandum (“Memorandum”).
2. On page 5 of the Memorandum, Staff explained that they are “unable at this time to determine whether or not the purchase price being paid by MAWC is above or below the net book value of Wardsville’s assets.” Staff did not offer an estimated rate base valuation, and Staff explained that any determination of value of any acquisition adjustment could be made in MAWC’s next general rate filing.
3. Given the holding of *AG Processing* that requires the Commission to consider the reasonableness of any acquisition premium in this type of proceeding, OPC believes that additional information is needed to address the reasonableness of any acquisition adjustment as required under the law.
4. Should MAWC affirm that it will not be seeking recovery of any acquisition premium, OPC believes such a statement resolves the issue of considering the reasonableness of any acquisition premium as required by *AG Processing*.

5. OPC requests that the Commission direct MAWC to file a statement in this case reflecting its position on this matter so that this issue can be resolved and so the Commission can properly consider all relevant factors as required by *Tartan* and *AG Processing*.

WHEREFORE OPC prays that the Commission issues an Order directing Missouri-American Water Company to file a statement reflecting its position as to the treatment of any acquisition adjustment so the Commission may properly consider all relevant factors as required by *Tartan* and *AG Processing*.

OFFICE OF PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

On this 23rd day of March, 2017, I hereby certify that a true and correct copy of the foregoing motion was submitted to all relevant parties by depositing this motion into the Commission's Electronic Filing Information System ("EFIS").

/s/ Ryan D. Smith