LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

DAVID V.G. BRYDON JAMES C. SWEARENGEN WILLIAM R. ENGLAND, III JOHNNY K. RICHARDSON GARY W. DUFFY PAUL A. BOUDREAU SONDRA B. MORGAN CHARLES E. SMARR PROFESSIONAL CORPORATION 312 EAST CAPITOL AVENUE P.O. BOX 455 JEFFERSON CITY, MISSOURI 65102-0456 TELEPHONE (573) 635-7166 FACS/MILE (573) 635-3847 E-MAIL: DCOOPER@BRYDDNLAW.COM

DEAN L. COOPER MARK G. ANDERSON GREGORY C. MITCHELL BRIAN T. MCCARTNEY DIANA C. FARR JANET E. WHEELER

OF COUNSEL RICHARD T, CIOTTONE

June 10, 2003

Secretary Public Service Commission P. O. Box 360 Jefferson City, MO 65102

FILED⁴ JUN 1 0 2003

Missouri Public Service Commission

RE: Case No. WR-2003-0500

Dear Secretary:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Recommendation Concerning Proper Test Year and a Motion for True-Up Audit and Hearing filed on behalf of Missouri-American Water Company. Please stamp the enclosed extra copy of each "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Ďean L. Cooper

DLC/tli Enclosures

cc: Cliff Snodgrass Ruth O'Neill Jan Bond Lisa C. Langeneckert Stuart Conrad

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

Missouri Public Service Commission

JUN 1 0 2003

In the Matter of the General Rate Increase for Water and Sewer Service Provided by Missouri-American Water Company.

Case No. WR-2003-0500

MOTION FOR TRUE-UP AUDIT AND HEARING

COMES NOW Missouri-American Water Company ("MAWC" or "Company") and for its Motion for True-Up Audit and Hearing, states to the Missouri Public Service Commission ("Commission") as follows:

1. MAWC requests that the Commission order a true-up audit and hearing in this case for the purpose of recognizing in MAWC's revenue requirement and rates, certain revenues, expenses and investments, as well as certain isolated items that will be known as of the end of the November 2003 accounting period. In its prepared direct testimony and schedules and in its Recommendation Concerning Proper Test Year, the Company recommends a Test Year consisting of the twelve months ended December 31, 2002.

2. In this motion, the Company seeks inclusion in its revenue requirement and rates of certain revenues that will be experienced, expenses that will be incurred, investments that will be made and certain items that will be known on or before the end of November 2003. The items of revenue, expense and investment which the company proposes to True-Up are as follows:

- Plant in service and other rate base items
- Customers/Revenues (associated revenues, production costs and uncollectible expense)
- Any change in the Commission's annual assessment
- Fuel and Power Expenses

1

- Capital Structure
- Chemicals
- Waste Disposal
- Rate case expenses
- Employee Levels and Wage Rates and related benefits
- Depreciation Expense
- Income Taxes
- Purchased Water Expense
- Property Tax
- One Call Expenses
- Deferred Security Expenses

4. MAWC believes that it would be appropriate for Staff to perform an audit on these items as soon as the books for November 2003 are closed. MAWC believes that such an audit could start as early as November 26, 2003. A true-up hearing, if necessary, could then be scheduled well in advance of the operation of law date.

5. The Company believes that it is reasonable and appropriate to grant a true-up audit and hearing for the above-enumerated items because these items represent significant changes in revenues, expenses and investments which will have occurred, or be known and measurable, no later than the end of the November 2003 accounting period (or nearly five months prior to when rates to be set in this proceeding will, in all likelihood, become effective). The Company's request for trueup represents a complete list of revenues, expenses and rate base and, thus, is designed to prevent any improper mismatch in the Company's overall revenue requirement. If, on the other hand, the Company's request for true-up audit and hearing is denied and the above-enumerated items of revenues, expenses and investments are not taken into account in the setting of its rates, the Company will be denied an opportunity to earn the authorized rate of return which the Commission determines is appropriate in this proceeding.

WHEREFORE, in light of the foregoing, the Company respectfully requests that the Commission issue its order granting a true-up audit and hearing as requested herein and such other orders as are appropriate in the circumstances.

Respectfully submitted,

Dean L. Cooper MBE#36592 William R. England, III MBE#23975 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 573/635-7166 (phone) 573/635-0427 (facsimile) dcooper@brydonlaw.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

Certificate of Service

I hereby certify that a true and correct copy of he above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this /0 th day of June, 2003, to the following:

Cliff Snodgrass Missouri Public Service Commission Governor State Office Building, 8th Floor Jefferson City, MO 65101

Jan Bond Diekemper, Hammond, et al. 7730 Carondelet Ave, Suite 200 St. Louis, MO 63105

Lisa C. Langeneckert 720 Olive Street, Suite 2400 St. Louis, MO 63101-2313 Ruth O'Neill Office of the Public Counsel Governor State Office Building, 6th Floor Jefferson City, MO 65101

Stuart Conrad Finnegan, Conrad & Peterson, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

60