

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	Case No. WR-2022-0303
General Rate Increase for Water and Sewer)	Case No. SR-2022-0304
Service Provided in Missouri Service Areas.)	

JOINT PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Missouri-American Water Company (“MAWC” or “Company”), and on behalf of the Staff of the Missouri Public Service Commission; Office of the Public Counsel; City of St. Joseph, Missouri; City of Riverside, Missouri; Midwest Energy Consumers Group; The Empire District Electric Company; Public Water Supply District No. 2 of Andrew County; Sunnydale Properties; Missouri Industrial Energy Consumers; and Triumph Foods, LLC (each, a “Party,” and collectively, the “Parties”), provides this *Joint Proposed Procedural Schedule*:

1. On August 5, 2022, the Missouri Public Service Commission (“Commission”) issued its *Order Granting Intervention and Order Directing Filing* wherein, among other things, the Commission directed that no later than August 10, 2022, the parties jointly, or separately, file a proposed procedural schedule

2. After discussion by the Parties, they propose the following procedural schedule.

Proposed Procedural Schedule

3. The Parties recommend that the Commission adopt the following Procedural Schedule:

Item	Date
Initial Tariff Filing, Company Direct Testimony and MFR	07/01/22
MAWC Data through June 30	07/31/22
Discovery Conference	09/27/22

Discovery Conference	10/25/22
Rev Req Direct Testimony – Non-Company Parties	11/22/22
Discovery Conference	11/29/22
Rev Req Technical Conference	12/05/22
Rate Design / CCOS Direct Testimony – Non-Company Parties	12/16/22
Rate Design / CCOS Technical Conference	12/22/22
List of Issues (among Parties only)	12/29/22
Discovery Conference	01/12/23
Rev Req Rebuttal Testimony (all parties)	01/18/23
Start of Public Hearings	01/18/23
Rate Design / CCOS Rebuttal Testimony (all parties)	01/25/23
End of Public Hearings	01/31/23
True-Up Data Provided to All Parties	01/31/23
Surrebuttal Testimony (all parties)	02/08/23
Parties Provide Valuation of Positions to Staff for Reconciliation	02/09/23
Last Day to Request Main Case Discovery	02/09/23
Reconciliation	02/10/23
List of Issues, Order of Witnesses, Order of Opening, Order of Cross	02/14/23
Settlement Conference (Two Days)	02/15/23
Last Day to Object to Discovery	02/16/23
Discovery Conference	02/17/23
Statement of Positions	02/21/23
Evidentiary Hearing (Two Weeks)	02/27/23

True-Up Direct	03/14/23
True-Up Rebuttal	03/27/23
Last Day to Request True-Up Case Discovery	03/28/23
Initial Briefs	03/31/23
True-Up Hearing	04/04/23
Reply and True-Up Briefs	04/14/23
Operation of Law Date	05/28/23

Discovery Conditions

4. The Parties agree to provide all workpapers, in electronic format, whenever feasible, within two business days following the date on which the related testimony is filed. Workpapers containing confidential information shall be appropriately marked pursuant to Commission Rule 20 CSR 4240-2.135. If there are no workpapers associated with testimony, the party's attorney shall so notify the other parties within the time allowed for providing those workpapers.

5. Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly-available format where inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the Party providing the workpaper or response shall provide this type of information in that original format with formulas intact.

6. All Parties shall provide copies of testimony, schedules, exhibits, and pleadings to other counsel of record by electronic means and in electronic form essentially concurrently with the filing of such testimony, schedules, exhibits, or pleadings where the information is available in electronic format. Parties shall not be required to put information that does not exist in electronic

format into electronic format for purposes of exchanging it.

7. The Parties agree as follows with respect to Data Requests:

(A) Beginning November 22, 2022, the response time for all data requests shall be ten (10) calendar days to provide the requested information, and five (5) business days to object or to notify the requesting party that more than ten (10) calendar days will be needed to provide the requested information.

(B) Beginning January 18, 2023, the response time for data requests shall be five (5) business days to provide the requested information, and three (3) business days to object or to notify the requesting party that more than five (5) business days will be needed to provide the requested information.

(C) Data requests sent after 5:00 p.m. on Monday-Friday or on a weekend or state/federal holiday, will be considered served on the next business day.

(D) The Parties shall make an effort to not include in data request questions confidential information, and the Parties shall make an effort not to over-designate information as confidential. If confidential information must be included in data request questions, the confidential information should be appropriately designated as such pursuant to 20 CSR 4240-2.135. Responsibility to make this designation is upon the Party claiming such. Other Parties are entitled to rely on the presence or absence of such designation.

(E) Any data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System (EFIS) pursuant to 20 CSR 4240-2.090(2)(H). All data requests other than those issued to or by Staff, as well as all objections to data requests, or notifications of the need for additional time to respond, shall be sent by e-mail to counsel for the other parties. If a party desires the response to a data

request that has been served on another party, the party desiring a copy of the response must request in writing a copy of the response from the party answering the data request, thereby providing the responding party the opportunity to object. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. If any party responds to a data request in EFIS, the response is available in EFIS to all counsel on the certified service list. Data request responses, other than responses to data requests in EFIS, shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of responses to data requests Staff issues, MAWC shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.

8. The Parties agree to the following provisions regarding discovery conferences:

(A) Discovery conferences will be held in Room 305 at the Commission's office at the Governor's Office Building, 200 Madison Street, Jefferson City, Missouri, with remote connectivity via Webex to be provided upon any Party's request. Each discovery conference will begin at 10:00 a.m.

(B) Not less than three (3) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel. Any party may attend a discovery conference, but only those parties involved in an identified discovery

disagreement must attend. If the parties do not identify any discovery disagreements or concerns as described herein, the presiding officer may cancel the conference.

(C) Discovery conferences shall be on the record and shall be transcribed by a court reporter.

(D) Any pending written discovery motion may be taken up at a discovery conference and may be ruled upon by the presiding regulatory law judge either on the record, or in a written order.

(E) Commission Rule 20 CSR 4240-2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion is waived.

9. The undersigned parties recommend that the Commission adopt the following additional procedural rules:

(A) For the Statements of Position, each party shall file a simple and concise statement summarizing its position on each disputed issue, including citations to pre-filed testimony supporting its position.

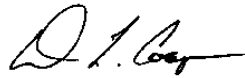
(B) All parties shall provide copies of testimony (including schedules), exhibits, and pleadings to other counsel of record by electronic means and in electronic form, essentially concurrently with the filing of such testimony, exhibits, or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging.

(C) Public documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail. The parties agree confidential

documents may be obtained from EFIS and so agree not to serve those documents via email.

WHEREFORE, MAWC and the other Parties pray that the Commission will establish the Procedural Schedule as set out herein.

Respectfully submitted,



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**ATTORNEYS FOR MISSOURI-AMERICAN
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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 on August 10, 2022, to the following:

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