

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

In the matter of the Petition of Missouri- )  
American Water Company for Approval ) **File No. WO-2015-0211**  
to Change its Infrastructure System )  
Replacement Surcharge (ISRS). )

**THE OFFICE OF THE PUBLIC COUNSEL’S POSITION STATEMENT**

COMES NOW the Office of the Public Counsel (Public Counsel) and states its position on the issues in this case as follows:

**I. Revenue Reconciliation and 10% Cap**

**Should the amount of ISRS revenues authorized by the Commission associated with reconciliation of prior under or over collections be included or excluded from the ISRS revenue cap calculation for MAWC in this proceeding?**

Public Counsel did not file testimony on this issue and reserves the right to base a final position on the testimony provided at hearing.

**II. Regulatory Asset**

**If MAWC is prohibited from recovering ISRS amounts due to the application of the ISRS cap, should it be authorized to record its under recovery in a regulatory asset account for consideration in MAWC’s next rate case, or next ISRS filing after its ISRS has been set to zero?**

Public Counsel did not file testimony on this issue and reserves the right to base a final position on the testimony provided at hearing.

**WHEREFORE**, Public Counsel respectfully submits its Position Statement on the issues  
in this case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/s/ Christina L. Baker**

By: \_\_\_\_\_

Christina L. Baker (#58303)

Deputy Public Counsel

P O Box 2230

Jefferson City, MO 65102

(573) 751-5565

(573) 751-5562 FAX

christina.baker@ded.mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 26<sup>th</sup> day of May 2015:

**Missouri Public Service Commission**

Cydney Mayfield  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
Cydney.Mayfield@psc.mo.gov

**Missouri Public Service Commission**

Office General Counsel  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
staffcounsellservice@psc.mo.gov

**Missouri-American Water Company**

Dean L Cooper  
312 East Capitol  
P.O. Box 456  
Jefferson City, MO 65102  
dcooper@brydonlaw.com

**Missouri-American Water Company**

Timothy W Luft  
727 Craig Road  
St. Louis, MO 63141  
Timothy.Luft@amwater.com

/s/ **Christina L. Baker**

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