

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

In the Matter of the Petition of)	
Missouri-American Water Company for)	<u>File No. WO-2023-0008</u>
Approval to Change a Water and Sewer)	Tariff No. YW-2023-0052
Infrastructure Rate Adjustment (“WSIRA”))	Tariff No. YS-2023-0053

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and hereby submits its Staff Recommendation and Memorandum in this matter, stating:

1. Sections 393.1500-1509, RSMo, provide that eligible water and sewer corporations may recover certain infrastructure system replacement costs through a Water and Sewer Infrastructure Rate Adjustment (“WSIRA”). Pursuant to Commission Rule 20 CSR 4240-4.017, Missouri-American Water Company (“MAWC”) filed its 60-day notice on July 1, 2022.

2. On September 9, 2022, MAWC filed its *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA)* (“Petition”) with the Missouri Public Service Commission (“Commission”), and attached to MAWC’s *Petition* were Appendices A – L. MAWC also filed tariff sheets in the tariff tracking files, YW-2023-0052 and YS-2023-0053.

3. On September 14, 2022, the Commission granted MAWC’s *Motion to Consolidate* WSIRA cases WO-2023-0008 (water) and SO-2023-0009 (sewer), suspended MAWC’s tariff sheets (YW-2023-0052 and YS-2023-0053) until March 8, 2023, and ordered Staff to file its recommendation no later than December 8, 2022. No parties requested intervention.

4. MAWC submitted its Petition to recover WSIRA investment that was placed into service for the period May 1, 2022, to July 31, 2022, with estimated WSIRA costs for August 1, 2022, through October 31, 2022, also included. MAWC estimated in its Petition that it was entitled to WSIRA water revenues of \$13,645,968 and sewer revenues of \$72,905. This would equate to an increase of approximately 4.1% for water and 0.6% for sewer based on the base revenue level approved by the Commission in its most recent rate case. The WSIRA proposal also includes an estimated adjustment of (\$3,298) to reflect an over-collection from previously authorized WSIRA sewer revenues.

5. Based upon its investigation and calculations, Staff concludes that MAWC's actual WSIRA rates should be designed to recover annual WSIRA revenues of \$11,548,088 from St. Louis County water customers, \$2,571,709 from All Other water customers, (\$1,077) from Arnold sewer customers, and \$6,786 from All Other sewer customers for a total of \$14,125,506.

6. Staff's calculations reflect the overall pre-tax weighted average cost of capital of 8.71% (tax grossed up rate of return) and MAWC's current depreciation rates, as reflected in the *Stipulation and Agreement* approved and ordered by the Commission on April 7, 2021, in Case No. WR-2020-0344, MAWC's last general rate case.

7. Staff based its conclusions on an examination of work orders and supporting documentation for the projects included for recovery in MAWC's proposed WSIRA filing, as well as from a review of the *Stipulation and Agreement* in Case No. WR-2020-0344. Staff agrees with the methodology utilized by MAWC in the calculation of the WSIRA revenue requirement for the purpose of this WSIRA filing. In its calculation of the WSIRA revenue requirement Staff utilized the replacement of estimated

costs included in the WSIRA plant balances included in the Company's direct filing with the actual cost for that period.

8. MAWC is current on its quarterly assessment payments and is not delinquent for prior year's assessments, nor does MAWC have any past due annual reports. In addition, at this time MAWC's WSIRA has not been in effect for a twelve-month period so a reconciliation of WSIRA revenues is not required in this case.

WHEREFORE, for the reasons stated above and in Staff's attached Memorandum, incorporated herein, Staff recommends that the Commission issue an order in this case that:

- 1) Rejects the following proposed tariff sheets filed in Tariff No. YW-2023-0052:
 - a. FORM NO. 13 P.S.C. MO NO. 13 5th Revised Sheet No. RT 11.1
Cancelling 4th Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 13 5th Revised Sheet No. RT 11.2
Cancelling 4th Revised Sheet No. RT 11.2;
- 2) Rejects the following proposed tariff sheets filed in Tariff No. YS-2023-0053:
 - a. FORM NO. 13 P.S.C. MO NO. 26 4th Revised Sheet No. RT 11.1
Cancelling 3rd Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 13 4th Revised Sheet No. RT 11.2
Cancelling 3rd Revised Sheet No. RT 11.2;
- 3) Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$11,548,088 from St. Louis County water customers, \$2,571,709 from All Other water customers, (\$1,077) from

Arnold sewer customers, and \$6,786 from All Other sewer customers for a total in this filing of \$14,125,506; and

4) Authorizes MAWC to file revised tariff sheets for each utility, service area, and customer class, as reflected in Staff's Appendix A1 – A4, which generates \$14,125,506.

Respectfully submitted,

/s/ Carolyn H. Kerr

Missouri Bar Number 45718

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

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Carolyn.kerr@psc.mo.gov

Attorney for Staff of the

Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and or counsel of record on this 8th day of December, 2022.

/s/ Carolyn H. Kerr

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. WO-2023-0008, Tariff No. YW-2023-0052 and YS-2023-0053

FROM: Alexis Branson, Auditing Department
Sherrye Lesmes, Auditing Department
Ashley Sarver, Auditing Department
Melanie Myers, Water, Sewer & Steam Department
Keri Roth, Water, Sewer & Steam Department

/s/ Ashley Sarver 12/08/2022
Lead Senior Utility Regulatory Auditor Date

/s/ Keri Roth 12/08/2022
Senior Research/Data Analyst Date

/s/ Carolyn Kerr 12/08/2022
Staff Counsel's Office Date

SUBJECT: Staff Report and Recommendation Regarding the Petition of Missouri-American Water Company for Approval to Change a Water and Sewer Infrastructure Rate Adjustment (“WSIRA”)

DATE: December 8, 2022

BACKGROUND

On September 9, 2022, Missouri-American Water Company (“Company” or “MAWC”) filed its *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA)* (“Petition”) with the Missouri Public Service Commission (“Commission”). The Company submitted its Petition pursuant to the provisions of the Missouri Water and Sewer Infrastructure Act, Sections 393.1500 to 393.1509, RSMo, and Commission Rule 20 CSR 4240-2.060(1). These sections provide that eligible water and sewer corporations may recover certain infrastructure system replacement costs without the need to file a formal rate case. Instead, these investments in infrastructure are recovered through a Water and Sewer Infrastructure Rate Adjustment (“WSIRA”). This is MAWC’s third WSIRA filing since its most recent general rate case, Case No. WR-2020-0344, as well as its third WSIRA filing under the enabling statutes cited above.¹

In this case (WO-2023-0008), MAWC submitted its Petition to recover WSIRA investment that was placed into service for the period May 1, 2022 to July 31, 2022, with estimated WSIRA costs for August 1, 2022 through October 31, 2022, also included. MAWC estimated in its Petition that it was entitled in this case to WSIRA water revenues of \$13,645,968 and sewer revenues of

¹ MAWC’s previous WSIRA filings are Case Nos. WO-2021-0428 and WO-2022-0176.

\$72,905. This would equate to an increase of approximately 4.1% for water and 0.6% for sewer based on the base revenue level approved by the Commission in its most recent rate case.

On September 14, 2022, the Commission issued its *Order Directing Notice, Setting Deadlines, Directing Filings, Consolidating Cases, and Suspending Tariffs* establishing October 7, 2022, as the deadline to intervene in the instant case. No other parties requested intervention. The Commission directed Staff to file a report regarding its recommendation of the WSIRA filing no later than December 8, 2022. The Commission ordered MAWC to respond to Staff's recommendation by December 15, 2022.

In the course of processing the Petition, the Company updated its numbers, and Staff calculated the new WSIRA rates. As is routine in this type of proceeding, the Company will need to submit new proposed tariff sheets that reflect its updated calculations and proposed WSIRA rates. The tariff sheets MAWC filed in this docket have an issue date of September 9, 2022, and an effective date of October 9, 2022. When the Commission approves new WSIRA rates, MAWC will need to submit new tariff sheets which include revised issue and effective dates. MAWC's most recent WSIRA tariff sheets approved by the Commission, in Case No. WO-2022-0176, were issued July 22, 2022, and became effective August 11, 2022.

STAFF INVESTIGATION

The Missouri Water and Sewer Infrastructure Act, Section 393.1506, RSMo, states:

A water or sewer corporation that provides water or sewer service to more than eight thousand customer connections may file a petition and proposed rate schedules with the commission to establish or change a WSIRA that will provide for the recovery of the appropriate pretax revenues associated with the eligible infrastructure system projects, less the appropriate pretax revenues associated with any retired utility plant that is being replaced by the eligible infrastructure system projects. The WSIRA shall not produce revenues in excess of fifteen percent of the water or sewer corporation's base revenue requirement approved by the commission in the water or sewer corporation's most recent general rate proceeding; provided, however, that neither WSIRA revenues attributable to replacement of customer-owned lead service lines, nor any reconciliation amounts described in subdivision (2) of subsection 5 of section 393.1509, shall count toward the program cap.

As noted in its Petition, MAWC serves approximately 474,000 water customers and 16,500 sewer customers, thereby meeting the WSIRA filing criteria of a corporation providing water or sewer service to more than 8,000 customer connections. In addition, the cumulative amount of WSIRA revenues that will result from this Petition does not exceed 15% percent, or \$52.2 million, of the

base revenue levels of \$348 million approved by the Commission in the most recent MAWC general rate case, Case No. WR-2020-0344.

Revenue Requirement in WR-2020-0344	\$348,000,000
WSIRA Cap per Legislation	15%
WSIRA \$ Cap	\$52,200,000 ²
Prior Approved - WSIRA WO-2021-0428	\$19,002,781
Prior Approved - WSIRA WO-2022-0176	\$17,812,512
Current Case - WSIRA WO-2023-0008	\$14,125,506 ³

As part of its analysis of MAWC's Petition, Auditing Staff reviewed supporting workpapers, descriptions of WSIRA projects, MAWC's accounting entries, and a sample of invoices representing approximately 66.67% of total WSIRA investment costs, as well as other applicable documentation, such as work order authorizations. Staff communicated with MAWC personnel to clarify MAWC's Petition when necessary.

THE PETITION

MAWC states in its Petition, as follows:

MAWC, per this Petition, seeks to change a WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The proposed WSIRA rate schedules filed concurrently with this Petition reflect the appropriate pre-tax revenues necessary to produce net operating income equal to MAWC's pretax weighted cost of capital multiplied by the net original cost of the eligible infrastructure system projects, including recognition of accumulated deferred income taxes and accumulated depreciation associated with eligible infrastructure system projects which are included in the petition to establish or change a WSIRA pursuant to Sections 393.1500 through 393.1509. MAWC also seeks to recover all state, federal and local income or excise taxes applicable to such income and to recover all other costs such a depreciation expense and property taxes due within 12 months of this filing.

MAWC states that the water or sewer utility plant projects for which it seeks recovery of pretax revenues consist of the following:

² According to Section 393.1506.1., RSMo, replacement of customer-owned lead service lines does not count toward the program cap. MAWC did not include in either this WSIRA filing, or either of its prior WSIRA filings (Case Nos. WO-2021-0428 and WO-2022-0176), costs related to the replacement of customer-owned lead service lines.

³ Includes WSIRA revenue adjustments for reconciliation.

1. Replacement of or cleaning and relining of existing water and sewer pipes, and associated valves, hydrants, meters, service lines, laterals, sewer taps, curb stops, and manholes;
2. Replacement of lead mains, lead goosenecks and lead service lines, and associated valves and meters;
3. Replacement of booster station and lift station pumps, with equipment of similar capacity and operation, as well as related pipes, valves, and meters;
4. Facilities relocations required due to construction or improvement of a highway, road, street, public way, or other public work by or on behalf of the United States, this state, a political subdivision of this state, or another entity having the power of eminent domain; provided that the costs related to such projects have not been reimbursed to the water or sewer corporation;
5. Replacement of water and wastewater treatment mechanical equipment with equipment of similar capacity and operation, including well and intake pumps, transfer pumps, high service or discharge pumps, and metering pumps; and
6. Replacement of Supervisory Control and Data Acquisition System (“SCADA”) components necessary for the operation and monitoring of remote installations including radio and cellular communication equipment, and programmable logic controllers.⁴

The Company’s Petition indicates that its proposed water rate schedule (including estimated amounts for August, September, and October of 2022) will produce estimated WSIRA revenues of \$13,645,968 or an increase of 4.1% based on the base water revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis. The WSIRA proposal includes an estimated adjustment of \$930,131 to reflect an under-collection of previously authorized WSIRA water revenues.

The Company’s Petition indicates that its proposed sewer rate schedule (including estimated amounts for August, September, and October of 2022) produce estimated WSIRA revenues of \$72,905 or an increase of 0.6% based on the base sewer revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis. The WSIRA proposal includes an estimated adjustment of (\$3,298) to reflect an over-collection from previously authorized WSIRA sewer revenues.

⁴ Section 393.1503.(7), RSMo.

STAFF'S REVENUE CALCULATION

Staff agrees with MAWC's methodology in calculating the WSIRA revenue requirement for this filing. Staff replaced the estimated costs filed in the Petition and updated the balances with the actual cost for that period.

During the course of its review, Staff discovered that MAWC did not initially provide all supporting documents to its workpapers. Staff worked with the Company to obtain those missing documents, such that all documentation has now been received.

Staff also found instances where the invoice amounts did not match amounts contained within the Company's workpapers. These discrepancies were use tax calculations that were applied to the invoices after the original invoice was created or materials and supplies added to the project. Staff worked with the Company to pinpoint the discrepancies. Staff received the correct documentation that matched the Company's workpapers.

THE WSIRA RATE SCHEDULES

Water

The proposed WSIRA water rate schedules include a volumetric rate for each affected customer class (Rate A, Rate B and Rate J), with the rate to be determined through the use of the customer class billing determinants from the Company's last rate case, Case No. WR-2020-0344, and the WSIRA revenues allocated to each affected customer class (Rate A, Rate B and Rate J) for both St. Louis County and the All Other Missouri District.

Sewer

The proposed WSIRA sewer rate schedules include the WSIRA Revenue Requirement for all sewer customers divided by the revenues authorized from the Company's last rate case, Case No. WR-2020-0344. This calculation represents a percentage that will then be applied to the customer's total bill.

In response to Staff Data Request No. 0005, the Company stated the following about using this methodology to calculate the WSIRA sewer rate:

- Q. 1. Please explain why MAWC chose to use the percent of authorized revenues to calculate the sewer tariff rates as shown in Appendix C Revenue Requirement, Tariff Rates page 3 of 7, tab line 44.

2. Please describe any other alternative rate designs considered by MAWC, other than what was filed for the calculation of the sewer rates. Please explain why each alternative rate design was not used.
- A. 1. MAWC water customers have metered usage and just as with the ISRS rates, the WSIRA rates can be designed based on that water usage. However, MAWC sewer customers are a mix of flat rate customers and metered customers. Because of this mix of rate design types for sewer customers, MAWC decided to propose a sewer WSIRA rate that is a percentage of the total customer bill. The revenues authorized in MAWC's most recent rate case were used as the basis because that should be the annual base rate revenue generated from the currently approved sewer rates. Therefore, including a surcharge of 1.0559% (for Arnold) and 6.5297% (for Other Sewer) of the customer bill should generate the appropriate sewer WSIRA revenue requirement.
2. MAWC also considered proposing a flat rate per customer to collect the appropriate sewer WSIRA revenue requirement, but the Company believed that to be less fair for customers than using a percentage of the customer bill. In the Company's proposed design, both larger commercial customers and smaller residential customers will bear a proportionate burden of the revenue requirement.

For this case, Staff finds it reasonable to utilize the Company's methodology for calculating the WSIRA water and sewer rates based on Staff's calculation of the WSIRA water and sewer revenue requirements. The WSIRA rates are reflected in Appendix A1 through Appendix A4 attached to this Memorandum.

ASSESSMENTS AND ANNUAL REPORTS

MAWC is current on its quarterly assessment payments and is not delinquent for the prior year's assessments. MAWC does not have any past due annual reports.

STAFF RECONCILIATION

Section 393.1509.5.(2), RSMo, requires a utility to reconcile the differences between the revenues resulting from a WSIRA and the appropriate pretax revenues, as found by the Commission, at the end of each 12-month calendar period that a WSIRA is in effect. The utility shall propose to recover or credit the difference, as appropriate, through the WSIRA. At this time, MAWC's WSIRA has been in effect for a 12 month period. Therefore, MAWC is required to reconcile its WSIRA revenues in this case. In the Company's updated workpapers, it calculated a reconciliation

adjustment of \$461,172, indicating it has over-recovered WSIRA revenues in that amount since it began collecting the WSIRA. Staff agrees with this calculation.

STAFF’S CONCLUSIONS

In its Petition, MAWC filed to recover WSIRA-eligible infrastructure system project costs incurred during the period of May 1, 2022, through October 31, 2022. In the Petition, MAWC estimated an amount of additional plant investment for August, September, and October of 2022. At the time MAWC filed its Petition, MAWC proposed WSIRA revenues for water of \$13,645,968 and sewer revenues of \$72,905. The final, updated workpapers, which include the actual WSIRA investments through October were received on November 22, 2022.

Based upon its investigation and calculations, Staff concludes the Company’s actual WSIRA rates should be designed to recover annual WSIRA revenues of \$11,548,088 from St. Louis County water customers, \$2,571,709 from All Other water customers, (\$1,077) from Arnold sewer customers, and \$6,786 from All Other sewer customers for a total of \$14,125,506.

	St. Louis County Water	Other Water	Arnold Sewer	Other Sewer	Total
Total Revenue Requirement	\$11,672,499	\$2,865,935	\$1,307	\$46,938	\$14,586,678
Reconciliation Adjustment (Overage)	(\$124,411)	(\$294,226)	(\$2,384)	(\$40,152)	(\$461,172)
Total WSIRA Revenue Requirement	\$11,548,088	\$2,571,709	(\$1,077)	\$6,786	\$14,125,506

Staff’s calculations reflect the overall weighted average cost of capital of 8.71% (tax grossed up rate of return) and MAWC’s current depreciation rates, as reflected in the Stipulation and Agreement the Commission approved and ordered on April 7, 2021, in Case No. WR-2020-0344.

Staff's calculations reflect the actual WSIRA eligible investment placed in service from May 1, 2022 through October 31, 2022. In addition, no property taxes have been included in Staff's calculation, as there will be no property tax liability from MAWC due within the next 12 months related to these WSIRA investments.

Staff based its conclusions on an examination of workpapers and supporting documentation for the projects included for recovery in MAWC's proposed WSIRA filing, as well as from a review of the Stipulation and Agreement in Case No. WR-2020-0344. As a result, it is Staff's conclusion that the project costs incorporated within this WSIRA filing meet the requirements of the governing statutes as summarized previously in this Memorandum in the discussion of the Company's Petition. As per the enabling statute, neither Staff nor the Commission is making a determination of the ultimate prudence of any of the projects included in this WSIRA filing.

STAFF'S RECOMMENDATION

Based on the above, Staff recommends that the Commission issue an order that:

1. Rejects the following proposed tariff sheets filed in Tariff No. YW-2023-0052:
 - a. FORM NO. 13 P.S.C. MO NO. 13 5th Revised Sheet No. RT 11.1 Cancelling 4th Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 13 5th Revised Sheet No. RT 11.2 Cancelling 4th Revised Sheet No. RT 11.2;
2. Rejects the following proposed tariff sheets filed in Tariff No. YS-2023-0053:
 - a. FORM NO. 13 P.S.C. MO NO. 26 4th Revised Sheet No. RT 11.1 Cancelling 3rd Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 13 4th Revised Sheet No. RT 11.2 Cancelling 3rd Revised Sheet No. RT 11.2;
3. Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$11,548,088 from St. Louis County water customers, \$2,571,709 from All Other water customers, (\$1,077) from Arnold sewer customers, and \$6,786 from All Other sewer customers for a total in this filing of \$14,125,506; and
4. Authorizes MAWC to file revised tariff sheets for each utility, service area, and customer class, as reflected in Staff's Appendix A1 – A4, which generates \$14,125,506.

Missouri-American Water Company
Case No. WO-2023-0008
Staff's WSIRA Water Rate Design Calculation
St. Louis District Water

	WSIRA Recovery		
	Staff Revenue Requirement	Billing Determinants Sales (000 Gal) (1)	WSIRA Rate per 1000 Gal.
Rate A	\$ 10,978,466	31,771,914	\$ 0.34554
Rate B	\$ 204,689	1,579,721	\$ 0.12957
Rate J	\$ 364,933	3,959,678	\$ 0.09216
	\$ 11,548,088	37,311,313	

(1) Per billing determinants in Case WR 2020-0344

Proposed WSIRA Rate Design Per 1,000 Gallons					
	Current WSIRA Rate		Adjustment to Current WSIRA Rate (2)		Proposed WSIRA Rate to Use on Tariff
Rate Per 1000 Gal					
Rate A	\$ 0.94280	\$	0.34554	\$	1.28834
Rate B	\$ 0.35354	\$	0.12957	\$	0.48311
Rate J	\$ 0.25146	\$	0.09216	\$	0.34362

(2) Calculated per above

Proposed WSIRA Rate Design Per 100 Gallons					
	Current WSIRA Rate		Adjustment to Current WSIRA Rate		Proposed WSIRA Rate to Use on Tariff
Rate Per 100 Gal					
Rate A	\$ 0.09428	\$	0.03455	\$	0.12883
Rate B	\$ 0.03535	\$	0.01296	\$	0.04831
Rate J	\$ 0.02515	\$	0.00922	\$	0.03436

Missouri-American Water Company
Case No. WO-2023-0008
Staff's WSIRA Water Rate Design Calculation
All Other District Water

	WSIRA Recovery Staff Revenue Requirement	Billing Determinants Sales (000 Gal) (1)	WSIRA Rate per 1000 Gal.
Rate A	\$ 2,218,110	8,964,577	\$ 0.24743
Rate B	\$ 96,825	1,214,373	\$ 0.07973
Rate J	\$ 256,774	2,971,865	\$ 0.08640
	\$ 2,571,709	13,150,816	

(1) Per billing determinants in Case WR 2020-0344

Proposed WSIRA Rate Design Per 1,000 Gallons				
	Current WSIRA Rate	Adjustment to Current WSIRA Rate (2)		Proposed WSIRA Rate to Use on Tariff
Rate Per 1000 Gal				
Rate A	\$ 0.47097	\$ 0.24743	\$	0.71840
Rate B	\$ 0.15176	\$ 0.07973	\$	0.23149
Rate J	\$ 0.16446	\$ 0.08640	\$	0.25086

(2) Calculated per above

Proposed WSIRA Rate Design Per 100 Gallons				
	Current WISRA Rate	Adjustment to Current WSIRA Rate		Proposed WSIRA Rate to Use on Tariff
Rate Per 100 Gal				
Rate A	\$ 0.04710	\$ 0.02474	\$	0.07184
Rate B	\$ 0.01518	\$ 0.00797	\$	0.02315
Rate J	\$ 0.01645	\$ 0.00864	\$	0.02509

Missouri-American Water Company
Case No. WO-2023-0008
Staff's WSIRA Sewer Rate Design Calculation
Arnold Sewer

	WSIRA Recovery Staff Revenue Requirement
WSIRA Staff Revenue Requirement	\$ 1,307
Revenues Authorized in Case No. WR-2020-0344	\$ 6,318,055
Percent (%) Authorized Revenues	0.0207%

Customer Bill
\$ 0.00770

Proposed WSIRA Sewer Rate Design			
	Current WSIRA Rate	Adjustment to Current WSIRA Rate (1)	Proposed WSIRA Rate to Use on Tariff
Arnold Sewer	0.8991%	0.0207%	0.9198%
(1) Calculated per above			

Missouri-American Water Company
Case No. WO-2023-0008
Staff's WSIRA Sewer Rate Design Calculation
All Other Sewer

	WSIRA Recovery Staff Revenue Requirement
WSIRA Staff Revenue Requirement	\$ 46,938
Revenues Authorized in Case No. WR-2020-0344	\$ 6,442,994
Percent (%) Authorized Revenues	0.7285%

Customer Bill		
\$	0.44905	
\$	0.32076	

Proposed WSIRA Sewer Rate Design			
	Current WSIRA Rate	Adjustment to Current WSIRA Rate (1)	Proposed WSIRA Rate to Use on Tariff
All Other Sewer	5.5519%	0.7285%	6.2804%
(1) Calculated per above			

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Petition of Missouri-)
American Water Company for Approval) Case No. WO-2023-0008
to Change a Water and Sewer)
Infrastructure Rate Adjustment)
)
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)
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AFFIDAVIT OF ALEXIS BRANSON

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ALEXIS BRANSON, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

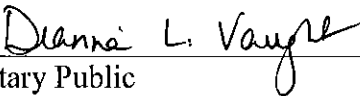


ALEXIS BRANSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 7th day of December, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Petition of Missouri-)
American Water Company for Approval) Case No. WO-2023-0008
to Change a Water and Sewer)
Infrastructure Rate Adjustment)
)
)
)

AFFIDAVIT OF SHERRYE LESMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SHERRYE LESMES, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

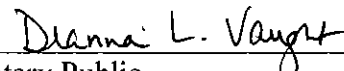
Further the Affiant sayeth not.



SHERRYE LESMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8th day of December, 2022.



Notary Public

DIANNA L VAUGHT Notary Public - Notary Seal STATE OF MISSOURI Cole County My Commission Expires: July 18, 2023 Commission #: 15207377
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BEFORE THE PUBLIC SERVICE COMMISSION
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In the Matter of the Petition of Missouri-)
American Water Company for Approval) Case No. WO-2023-0008
to Change a Water and Sewer)
Infrastructure Rate Adjustment)
)
)
)

AFFIDAVIT OF ASHLEY SARVER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ASHLEY SARVER, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

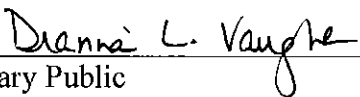


ASHLEY SARVER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 8th day of December, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Petition of Missouri-)
American Water Company for Approval) Case No. WO-2023-0008
to Change a Water and Sewer)
Infrastructure Rate Adjustment)
)
)
)
)

AFFIDAVIT OF MELANIE MYERS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MELANIE MYERS, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

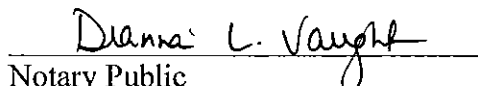
Further the Affiant sayeth not.



MELANIE MYERS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6th day of December, 2022.



Notary Public

DIANNA L VAUGHT Notary Public - Notary Seal STATE OF MISSOURI Cole County My Commission Expires: July 18, 2023 Commission #: 15207377
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Petition of Missouri-)
American Water Company for Approval) Case No. WO-2023-0008
to Change a Water and Sewer)
Infrastructure Rate Adjustment)
)
)
)
)

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KERI ROTH, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

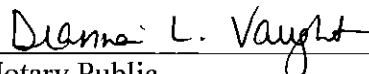
Further the Affiant sayeth not.



KERI ROTH

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6th day of December, 2022.



Notary Public

