

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

In the Matter of the Petition of Missouri-American)	<u>Case No. WO-2021-0428</u>
Water Company for Approval to Establish a)	<u>Case No. SO-2021-0429</u>
Water and Sewer Infrastructure Rate Adjustment)	File Nos. YW-2022-0049
("WSIRA").)	and YS-2022-0050

Staff Recommendation

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby submits its *Staff Recommendation and Memorandum* in the above-styled matter, stating:

1. On September 3, 2021, Missouri-American Water Company ("Company" or "MAWC") filed its *Petition for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) and Motion for Approval of Customer Notice* ("Petition") with the Missouri Public Service Commission.

2. The Company submitted its *Petition* pursuant to the provisions of the Missouri Water and Sewer Infrastructure Act, Sections 393.1500 and 393.1509, RSMo., and Commission Rule 20 CSR 4240-2.060(1). These sections provide eligible water and sewer corporations with the ability to recover certain infrastructure system replacement costs without the need to file a formal rate case. Instead, these investments in infrastructure are recovered through a WSIRA.

3. Based upon its investigation and calculations, Staff concludes the Company's WSIRA rates should be designed to recover annual WSIRA revenues of \$16,094,958 for St. Louis water, \$2,651,819 for All Other water, \$42,340 for Arnold sewer, and \$165,055 for All Other sewer for a total of \$18,954,172.

4. 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 approved and ordered by the Commission on April 7, 2021, in Case No. WR-2020-0344, MAWC's last general rate case.

5. Staff's calculations reflect the actual WSIRA eligible investment placed in service from January 1, 2021, through October 31, 2021. 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 this WSIRA investment.

6. 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. 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, Staff nor the Commission is making a determination of the ultimate prudence of any of the projects included in this WSIRA filing.

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

- 1) Rejects MAWC's WSIRA tariff sheets (YW-2022-0049 and YS-2022-0050 filed on September 3, 2021);
- 2) Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$16,094,958 for St. Louis water, \$2,651,819 for All Other water, \$42,340 for Arnold sewer and \$165,055 for All Other sewer for a total \$18,954,172;

- 3) Orders MAWC to add a graph that contains both WISRA water and sewer rates to Appendix K similar to Appendix H in MAWC's Petition;
- 4) Orders MAWC to file the following revised WSIRA tariff sheets that reflect Staff's calculated WSIRA rates:
 - a) 3rd Revised Sheet No. RT 11.1 Cancelling 2nd Revised Sheet No. RT 11.1 for St. Louis County;
 - b) 3rd Revised Sheet No. RT 11.2 Cancelling 2nd Revised Sheet No. RT 11.2 for All Missouri Service Areas Outside of St. Louis County;
 - c) 2nd Revised Sheet No. RT 11.1 Cancelling 1st Revised Sheet No. RT 11.1 for City of Arnold and Surrounding Area; and
 - d) 2nd Revised Sheet No. RT 11.2 Cancelling 1st Revised Sheet No. RT 11.2 for All Missouri Service Areas Outside of City of Arnold.

WHEREFORE, Staff prays that the Commission will issue an Order as described above; and grant such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ Kevin A. Thompson
KEVIN A. THOMPSON
Missouri Bar Number 36288
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Missouri Public Service Commission
P.O. Box 360
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Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, on this **2nd day of December, 2021**, to all parties as specified on the Service List maintained for this case by the Commission's Data Center.

/s/ Kevin A. Thompson

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. WO-2021-0428, Tariff No. YW-2022-0049 and YS-2022-0050

FROM: Keith D. Foster, Utility Regulatory Supervisor, Auditing Dept.
Caroline Newkirk, Senior Utility Regulatory Auditor, Auditing Dept.
Ashley Sarver, Senior Utility Regulatory Auditor, Auditing Dept.
Matthew J. Barnes, Senior Utility Regulatory Auditor, Water and Sewer Dept.

/s/ Caroline Newkirk 12/02/2021

Auditing Department / Date

/s/ Matthew J. Barnes 12/02/2021

Water and Sewer Department / Date

/s/ Kevin Thompson 12/02/2021

Staff Counsel's Office / Date

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

DATE: December 2, 2021

BACKGROUND

On September 3, 2021, Missouri-American Water Company ("Company" or "MAWC") filed its *Petition for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) and Motion for Approval of Customer Notice* ("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 and 393.1509, RSMo, and Commission Rule 20 CSR 4240-2.060(1). These sections provide eligible water and sewer corporations with the ability to recover certain infrastructure system replacement costs without the need to file a formal rate case. Instead, these investments in infrastructure are recovered through a WSIRA. This is the first WSIRA filing since the Company's most recent general rate case, Case No. WR-2020-0344, as well as being the Company's first WSIRA filing under the enabling statutes cited above.

The WSIRA process is a replacement for the former Infrastructure System Replacement Surcharge mechanism used by MAWC to recover certain infrastructure investments outside of general rate cases in past years. Among the major differences between the former ISRS mechanism and the current WSIRA mechanism are the following: (a) the categories of plant investment eligible for WSIRA inclusion are expanded beyond those that were previously eligible for ISRS inclusion; (b) investment in any of MAWC's divisions are eligible for ISRS inclusion, while only investments made in MAWC's St. Louis County area were eligible for inclusion in ISRS; and

(c) the overall cap on allowable WSIRA revenue collections is set at 15% of the revenues ordered in MAWC's prior general rate case, while the cap was previously set at 10% for ISRS purposes.

In the current case, MAWC submitted its Petition to reflect WSIRA investment that had been placed into service for the period January 1, 2021, to July 31, 2021, with estimated WSIRA costs through October 31, 2021, also included. MAWC estimated in its Petition that it was entitled in this case to WSIRA water revenues of \$18,124,667 and sewer revenues of \$57,602. This would equate to an increase of approximately 5.4% for water and 0.5% for sewer based on the base revenue level approved by the Commission in its most recent rate case. Since this is MAWC's first WSIRA petition, the expected revenues from the most recent MAWC ISRS filing are included in this filing. However, on the effective date of the WSIRA rate schedules, MAWC will reset its ISRS rate schedule to zero. Under the WSIRA enabling statute, a qualifying water or sewer provided cannot have both an ISRS and a WSIRA.

On September 9, 2021, the Commission issued its *Order Directing Notice, Setting Deadlines, Directing Filings, and Suspending Tariffs* establishing September 29, 2021, as the deadline to intervene in the instant case. The Commission directed Staff to file a report regarding its recommendation of the WSIRA filing no later than December 2, 2021.

STAFF INVESTIGATION

The Missouri Water and Sewer Infrastructure Act, Section 393.1506 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 471,000 water customers and 15,000 sewer customers, thereby meeting the WSIRA filing criteria of a corporation providing water or sewer service to more than eight thousand customer connections. In addition, the cumulative amount of WSIRA revenues that will result from this petition does not exceed fifteen 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.

In its Petition, MAWC filed to recover WSIRA qualifying infrastructure replacement costs incurred during the period of January 1, 2021, through July 31, 2021. In its initial filing, MAWC estimated an amount of additional plant investment for August, September, and October of 2021 as part of its request. MAWC provided supporting documentation for the investments made in January 2021 through July 2021 in response to Staff Data Requests No. 0001 and No. 0002 on October 12, 2021. MAWC subsequently provided Staff with additional documentation to support additions placed into service in August 2021 on November 12, 2021, and additions placed into service in September 2021 on November 15, 2021. The final batch of supporting documentation for additions placed into service in October 2021 was provided to Staff by MAWC on November 18, 2021. Also on November 18, 2021, MAWC provided Staff with updated workpapers to include the actual WSIRA investment through October 2021.

During the review of MAWC's additional supporting documentation, Staff found a number of invoices needed to support the requested WSIRA amount had still not been provided by MAWC. Staff has been working with the Company to obtain the omitted invoices. While the Company was able to produce a majority of the missing invoices prior to the filing deadline, Staff is still waiting on several. Staff has removed the costs associated with the remaining omitted invoices until the documentation can be provided. This is discussed further within Staff's Revenue Calculation section of this report.

As part of its examination 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

As stated in its Petition, MAWC:

. . . seeks to establish a WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. This Petition is MAWC's first request to establish a WSIRA. 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 and 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 as depreciation expense and property taxes due within 12 months of this filing.

In its Petition, MAWC indicates that all of the eligible infrastructure system requirements are water and sewer utility plant projects that meet the following criteria:

1. They replace or extend the useful life of existing infrastructure;
2. They are currently in service and used and useful;
3. Do not include projects intended solely for customer growth; and
4. They were not included in MAWC's base rates in its most recently completed general rate case, Case No. WR-2020-0344.

MAWC also indicates that the water or sewer utility plant projects on which it seeks to base the WSIRA are either:

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.

The Company's Petition indicates that its proposed water rate schedule (including estimated amounts for August, September, and October of 2021) will produce WSIRA revenues of \$18,124,667, or an increase of 5.4% based on the base water revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis.¹

The Company's Petition indicates that its proposed sewer rate schedule (including estimated amounts for August, September, and October of 2021) will produce WSIRA revenues of \$57,602, or an increase of 0.5% based on the base sewer revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis.²

STAFF'S REVENUE CALCULATION

With the exception of the items listed and discussed in further detail below, 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 following approaches:

1. Replacement of estimated costs included in the WSIRA plant balances included in the Company's direct filing with actual costs for that period.
2. Removal of costs that did not match supporting documents or where supporting documents were not provided as described below.
3. Removal of a non-WSIRA eligible project as described below.

During the course of its review, Staff questioned MAWC about a charge shown in their workpapers in the amount of \$617,985.17 that did not match the supporting invoice from Badger Meter in the amount of \$281,203.20. MAWC looked into the discrepancy and identified this project as not being WSIRA-eligible and agreed to remove it along with any related overheads from their updated workpapers. Staff has made that same removal in its workpapers.

Staff also discovered multiple amounts in the Company's workpaper where supporting documents were not initially provided by MAWC. Staff worked with the Company to obtain those missing documents. At the time of filing, most of that documentation has now been received. However, invoices are still missing for approximately \$112,809 in WSIRA costs. Staff has removed those amounts from the revenue requirement for now along with the affects those costs have on

¹ MAWC's Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice, Page 3, Paragraph 8.

² MAWC's Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice, Page 3, Paragraph 9.

depreciation expense, accumulated depreciation, and deferred taxes. Staff is open to adding these amounts back in if MAWC is able to provide the invoices and Staff confirms the documents match and support the Company's workpapers.

In addition to the omitted invoices, Staff found instances where the invoice amounts did not match amounts contained within the Company's workpapers. Staff is working with the Company to pinpoint where these discrepancies lie. MAWC has purported the differences may be indicative of a use tax calculation that is applied to invoices for out of state vendors. The Company is working to provide a list of out of state vendors and use tax rates so that Staff can substantiate this explanation for the differences. In the meantime, Staff has removed any amounts that were included by MAWC in its proposed WSIRA recovery that did not match the supporting invoices for a total of \$362,049. Staff removed these costs from its calculation of the water utility plant projects. Staff is open to adding these amounts back in if MAWC is able to provide adequate documentation and explanations as to the amount of discrepancies.

This exclusion of all the items mentioned above resulted in a \$123,229 net reduction to MAWC's revenue requirement. As mentioned above, MAWC has already removed the project that was ineligible for WSIRA from their updated workpapers which accounts for \$74,620 of the net reduction in revenue requirement.

With this change, Staff's recommended WSIRA revenue requirement for MAWC in this petition for water is \$18,746,777 and for sewer is \$207,395. The water is a 5.6% increase and the sewer is a 1.6% increase based on the base revenue level approved by the Commission in its most recently completed general rate proceeding. Although Staff's revenue requirement is higher than what MAWC filed for in its petition, it is lower than the revenue requirement reflected in MAWC's updated workpapers, which replaced August-October estimated amounts with actual numbers. The table below compares the revenue requirements discussed in this section:

Entity	Description	Revenue Requirement
MAWC	Filed with petition Estimates for August-October 2021	\$18,182,269
MAWC	Updated workpapers sent to Staff Actuals for Aug-Oct 2021	\$19,077,401
MAWC	Updated workpaper sent to Staff Actuals for Aug-Oct 2021 AND removal of ineligible project	\$19,002,781
STAFF	Staff's Calculation filed with Case Memorandum	\$18,954,172

Appendix K to MAWC's Petition

In MAWC's Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice in this case, MAWC requested that the Commission approve three customer notices marked Appendix J, Appendix K and Appendix L. Staff has reviewed Appendix J, Appendix K and Appendix L and recommends approving the notices with the following modification to Appendix K.

Appendix K displays a graph with WSIRA water rates divided into the appropriate customer class and region, but does not contain WSIRA sewer rates. MAWC provided information that will be posted on its website marked as Appendix H. Appendix H contains a graph that displays both the water and sewer WSIRA rates. Staff recommends MAWC add a similar graph that contains both WSIRA water and sewer rates to Appendix K.

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 the St. Louis District 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 percent that will then be applied to the customer's total bill.

In response to Staff Data Request No. 0006, the Company stated the following for using this methodology to calculate the WSIRA sewer rate:

- Q. (1) Please provide an explanation to 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 tab line 39, column G.
- (2) Please describe any other alternative rate designs considered by MAWC, other than what was filed for the calculation of the sewer rates? If so, 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 0.9008% 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.

Staff agrees with and used 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 to this Memorandum.

ASSESSMENTS AND ANNUAL REPORTS

In accordance with established practice regarding the submission of Staff recommendations to the Commission, Staff reviewed the payment history for MAWC's annual Commission assessment fees and the status of MAWC's annual report filings. Based on its review of this information, Staff found that MAWC is current on its quarterly assessment payments and is not delinquent for prior year's assessments. In addition, MAWC does not have any past due annual reports.

STAFF RECONCILIATION

Statute Section 393.1509 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 twelve-month calendar period that a WSIRA is in effect. 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.

STAFF'S CONCLUSIONS

Based upon its investigation and calculations, Staff concludes the Company's WSIRA rates should be designed to recover annual WSIRA revenues of \$16,094,958 for St. Louis water, \$2,651,819 for All Other water, \$42,340 for Arnold sewer, and \$165,055 for All Other sewer for a total of \$18,954,172.

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 approved and ordered by the Commission on April 7, 2021, in Case No. WR-2020-0344, MAWC's last general rate case.

Staff's calculations reflect the actual WSIRA eligible investment placed in service from January 1, 2021, through October 31, 2021. 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 this WSIRA investment.

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. 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, 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 MAWC's WSIRA tariff sheets (YW-2022-0049 and YS-2022-0050 filed on September 3, 2021);
2. Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$16,094,958 for St. Louis water, \$2,651,819 for All Other water, \$42,340 for Arnold sewer and \$165,055 for All Other sewer for a total \$18,954,172;
3. Order MAWC to add a graph that contains both WSIRA water and sewer rates to Appendix K similar to Appendix H in MAWC's Petition; and

4. Order MAWC to file the following revised WSIRA tariff sheets that reflects Staff's calculated WSIRA rates:
 - a) 3rd Revised Sheet No. RT 11.1 Cancelling 2nd Revised Sheet No. RT 11.1 for St. Louis County;
 - b) 3rd Revised Sheet No. RT 11.2 Cancelling 2nd Revised Sheet No. RT 11.2 for All Missouri Service Areas Outside of St. Louis County;
 - c) 2nd Revised Sheet No. RT 11.1 Cancelling 1st Revised Sheet No. RT 11.1 for City of Arnold and Surrounding Area; and
 - d) 2nd Revised Sheet No. RT 11.2 Cancelling 1st Revised Sheet No. RT 11.2 for All Missouri Service Areas Outside of City of Arnold.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

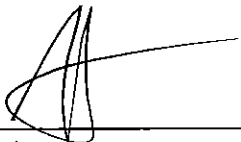
In the Matter of the Petition of Missouri-)
American Water Company for Approval to) Case No. WO-2021-0428
Establish a Water and Sewer Infrastructure)
Rate Adjustment ("WSIRA"))

AFFIDAVIT OF KEITH D. FOSTER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Keith D. Foster, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.


Further the Affiant sayeth not.



Keith D. Foster

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 30th day of November, 2021.



Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

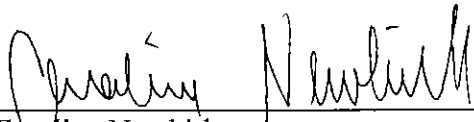
In the Matter of the Petition of Missouri-)
American Water Company for Approval to) Case No. WO-2021-0428
Establish a Water and Sewer Infrastructure)
Rate Adjustment ("WSIRA"))

AFFIDAVIT OF CAROLINE NEWKIRK

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Caroline Newkirk, 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, under penalty of perjury.

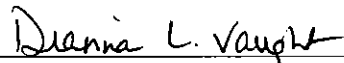
Further the Affiant sayeth not.



Caroline Newkirk

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 22nd day of November, 2021.



Notary Public

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2023 Commission Number: 15207377

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

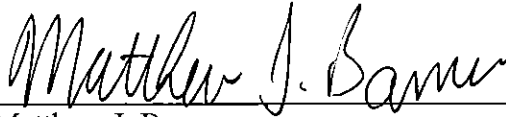
In the Matter of the Petition of Missouri-)
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Establish a Water and Sewer Infrastructure)
Rate Adjustment ("WSIRA"))

AFFIDAVIT OF MATTHEW J. BARNES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW Matthew J. Barnes, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

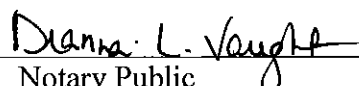
Further the Affiant sayeth not.



Matthew J. Barnes

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 1st day of December, 2021.



Notary Public

