

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

In the Matter of the Petition of)
Missouri-American Water Company for) File No. WO-2019-0184
Approval to Change an Infrastructure)
System Replacement Surcharge (ISRS).)

MAWC’S RESPONSE TO STAFF RECOMMENDATION

COMES NOW Missouri-American Water Company (“MAWC”), by and through counsel, and hereby notifies the Missouri Public Service Commission (“Commission”) of MAWC’s the following disagreement with the Staff Recommendation:

1. MAWC filed its ISRS petition on February 20, 2019, requesting a change in its ISRS revenues for ISRS-eligible infrastructure system replacements and relocations made during the period of October 1, 2018, through March 31, 2019.

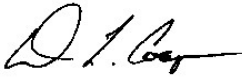
2. The Staff Recommendation concerning MAWC’s petition was filed on April 22, 2019. The Staff Recommendation requests that the Commission approve Staff’s recommended ISRS surcharge revenues in the incremental pre-tax amount of \$8,878,845, as shown in Appendices A and B to the Staff Recommendation.

3. Having reviewed the April 22, 2019 Staff Recommendation, MAWC hereby notifies the Commission that it disagrees with Staff’s recommended increase in ISRS revenues. In particular, MAWC objects to Staff’s treatment of net operating losses (“NOLs”).

4. Additionally, MAWC recognizes that Staff removed \$7,366 of investment that was alleged to be associated with 1) repairs to customer owned appliances and property (\$1,295); 2) service lines (\$3,278); and, 3) investment included in a prior ISRS (\$2,793). The Company does not object to these adjustments.

WHEREFORE, MAWC respectfully submits this Response to Staff Recommendation and requests that the Commission issue an order setting a procedural schedule that will allow for this matter to be heard the week of May 20, 2019.

Respectfully submitted,



L. Russell Mitten MBE #27881
Dean L. Cooper MBE #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
dcooper@brydonlaw.com
rmitten@brydonlaw.com

Timothy W. Luft, MBE #40506
Corporate Counsel
MISSOURI-AMERICAN WATER
COMPANY
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 telephone
(314) 997-2451 facsimile
timothy.luft@amwater.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 26th day of April, 2019, to:

Casi Aslin
Office of the General Counsel
staffcounsel@psc.mo.gov
casi.aslin@psc.mo.gov

Office of the Public Counsel
opcservice@ded.mo.gov

