

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

In the Matter of the Proposed Missouri-American) **File No. WT-2019-0054**
Water Company 2nd Revised Tariff Sheet No. R.65) Tracking No. JW-2019-0019

**MOTION FOR ADDITIONAL NOTICE
AND REQUEST TO EXTEND ALL DEADLINES**

COMES NOW, Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for this *Motion for Additional Notice and Request to Extend All Deadlines (Motion)*, states as follows:

1. On Tuesday, August 21, 2018, Missouri-American Water Company (MAWC or Company) filed its P.S.C. Mo. No. 13, 2nd Revised Tariff Sheet No. R. 65 (2nd Revised R. 65) to replace the 1st Revised Tariff Sheet No. R. 65.

2. As a result, Staff sought a suspension of the 2nd Revised R. 65 because if approved, the proposed tariff potentially affects all Missouri-American Water Company (MAWC or Company) ratepayers, should rates be set in a subsequent rate case. Staff recommended suspension of the proposed tariff for further proceedings before the Commission.

3. On September 5, 2018, the Commission issued its *Order Suspending Tariff, Directing Notice, Setting Intervention Deadline, and Directing Filing of Staff Recommendation (Order Directing Notice)*. That *Order Directing Notice*, set an intervention deadline of September 17, 2018, directed a Staff Recommendation regarding the tariff filing of October 5, 2018, and suspended the proposed tariff until November 7, 2018.

4. Staff primarily views the issue raised by the tariff as a matter of policy for the Commission to decide, namely: “When MAWC is taxed due to the receipt of CIAC, from whom should the Company recoup those costs—the ratepayers, or, the entities contributing capital in aid of construction?”

5. Staff suggests that other stakeholders, in particular, those who frequently participate in MAWC rate cases, may have viewpoints and arguments relevant to the consideration of this question. As a result, their participation could be valuable and instructive to the Commission’s own deliberation upon this policy question.

6. Therefore, Staff recommends that the Commission provide notice of this matter to the participants in the last MAWC rate case, Case No. WR-2017-0285, who may also have an interest, and who would potentially be affected by a decision upon this tariff. As a result, Staff further recommends extending the current deadlines of intervention, the Staff Recommendation, and suspension termination by 30 days each to accommodate the possibility of more intervenors.

7. While the 2nd Revised R. 65 tariff does not trigger a general rate proceeding under 4 CSR 240-2.065, because the tariff is a new “practice,” § 393.150.1 and 2 RSMO apply, and the Commission has authority to further suspend the tariff as authorized by statute.

WHEREFORE, Staff respectfully requests that the Commission issue an order:

- A. Sending notice of this case to the participants in Case No. WR-2017-0285;
- B. Extending the deadline for intervention from September 17, to October 17; extending the deadline for Staff’s Recommendation regarding 2nd Revised R. 65 from

October 5, to November 5, and as authorized by § 393.150 RSMo, extending the suspension termination date of November 7, to December 7, 2018; and

C. Any further relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Jacob T. Westen

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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 11th day of September, 2018.

/s/ Jacob T. Westen