

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

In the Matter of Missouri-American Water)
Company's Request For a Variance From Certain)
Requirements Set Forth in 4 CSR 240-2.050) **File No. WE-2010-0136**

RECOMMENDATION ON TARIFF COMPLIANCE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and respectfully states the following to the Missouri Public Service Commission (Commission):

Procedural History

1. On October 30, 2009, Missouri-American Water Company (Missouri-American or Company) filed an *Application* to seek a variance from the Commission's regulations regarding residential service that proposed to modify the effective period of a notice of discontinuance from eleven (11) business days to twenty (20) business days for quarterly billed customers in the Saint Louis Metro service district only.

2. On January 19, 2010, the Staff filed a *Recommendation* that stated the Staff's belief that a variance was in the public interest as it would support reductions in a customer's receipt of numerous disconnection notices, the risk of uncollectable accounts and further accumulation of past due amounts by the customer, among other benefits.

3. Additionally, Attachment A of the Staff's *Recommendation* contained proposed tariff modifications for the Company's use in implementing a variance if granted by the Commission.

4. On March 3, 2010, the Commission issued its *Order Granting Variance For Discontinuance of Service in Saint Louis County (Order Granting Variance)* that granted a variance and directed Missouri-American to file a tariff that conformed to the language as set forth in Attachment A of the Staff's *Recommendation*.

5. On July 30, 2010, Missouri-American filed revised tariff sheets with an effective date of August 29, 2010, assigned Tracking No. YW-2011-0053: P.S.C. MO NO. 6 (4th Revised) Sheet No. R 2.2, Cancelling (3rd Revised) Sheet No. R 2.2; P.S.C. MO NO. 6 (4th Revised) Sheet No. R 2.3, Cancelling (3rd Revised) Sheet No. R 2.3; and P.S.C. MO. NO. 6 (5th Revised) Sheet No. R 9.0(a), Cancelling (4th Revised) Sheet No. R 9.0(a).

6. James A. Merciel, Jr., Water and Sewer Utility Regulatory Engineering Supervisor for the Staff, has reviewed the tariff sheets and to the best of his knowledge, information, and belief, the tariff sheets comply with the language set forth in Attachment A of the Staff's *Recommendation*, and the Commission's *Order Granting Variance*.

WHEREFORE, the Staff submits this *Recommendation On Tariff Compliance* to the Commission for its information and consideration, and recommends that the Commission issue an order approving the tariff sheets as filed in Tracking No. YW-2011-0053, effective August 29, 2010: P.S.C MO NO. 6 (4th Revised) Sheet No. R 2.2, Cancelling (3rd Revised) Sheet No. R 2.2; P.S.C MO NO. 6 (4th Revised) Sheet No. R 2.3, Cancelling (3rd Revised) Sheet No. R 2.3; and P.S.C. MO. NO. 6 (5th Revised) Sheet No. R 9.0(a), Cancelling (4th Revised) Sheet No. R 9.0(a).

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail on John J. Reichart, Missouri-American Water Company at john.reichart@amwater.com; Dean L. Cooper, Brydon, Swearngen & England P.C., attorney for MAWC at dcooper@brydonlaw.com; and the Office of Public Counsel at opcservice@ded.mo.gov this 12th day of August, 2010.

/s/ Jennifer Hernandez