

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

In the Matter of the Proposed Missouri-American) **File No. WT-2020-0XXX**
Water Company Revised Tariff Sheets) Tracking No. JW-2020-0076

MOTION TO SUSPEND TARIFF SHEETS AND OPEN NEW DOCKET

COMES NOW, Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for the following *Motion to Suspend Tariff Sheets and Open New Docket*, states as follows:

1. Missouri-American Water Company (MAWC or Company) filed its revised Private Fire Protection tariff sheets¹ with the Commission on November 8, 2019, bearing an effective date of December 8, 2019. The tariff sheets were assigned tracking number JW-2020-0076, and are attached to this pleading as Attachment A.

2. Currently, all MAWC customers that have hydrants placed on private property attached to public mains² and/or receive service for fire protection systems installed on private property,³ are charged a flat rate. All customers that subscribe to these services are billed monthly, except those in St. Louis County; customers in St. Louis County are billed annually. The proposed revised tariff sheets do not seek to change any monthly or annual fire protection rate charged to customers,⁴ but do seek to allow MAWC

¹ P.S.C. Mo. No. 13, 5th Revised Sheet No. RT 3.1 Cancelling the 4th Revised Sheet No. RT 3.1 and P.S.C. Mo. No. 13, 4th Revised Sheet No. RT 3.2 Cancelling 3rd Revised Sheet No. RT 3.2.

² P.S.C. Mo. No. 13 4th Revised Tariff Sheet No. RT 3.1.

³ P.S.C. Mo. No. 13 3rd Revised Sheet No. RT 3.2.

⁴ The rates charged by MAWC for hydrants placed on private property attached to public mains are as follows:

	<u>Monthly Billing</u>	<u>Annual Billing</u>
Per Private Hydrant	\$53.70	\$644.40

to bill all fire protection customers monthly, while providing St. Louis County fire protection customers the option to choose to continue to be billed annually.

3. Pursuant to 20 CSR 4240-2.065, the Commission shall establish a case file for a tariff when a pleading is filed which objects to a tariff or requests the suspension of a tariff.

4. While the Company has expressed interest in having the proposed tariffs sheets go into effect as soon as possible,⁵ Staff has determined that this proposed tariff revision may be of interest to other parties. In order to effectuate a more transparent process, and to allow interested parties the opportunity to participate, Staff respectfully asks the Commission to suspend the operation of MAWC's proposed tariff sheets, and direct its Staff to file a recommendation. Staff will conduct its review as quickly as practically possible.

WHEREFORE, Staff prays that the Commission will open a new docket pursuant to Rule 20 CSR 4240-2.065 upon receipt of this *Motion*; suspend the proposed tariff sheets so that they do not go into effect December 8, 2019; and grant such other and further relief as the Commission deems just in the circumstances.

The rates charged by MAWC for fire protection systems installed on private property are as follows:

<u>Fire Outlet or Tap Connection Size</u>	<u>Monthly Billing</u>	<u>Annual Billing</u>
2" or Less	\$6.00	\$72.00
3"	\$19.36	\$232.32
4"	\$23.85	\$286.20
6"	\$53.70	\$644.40
8"	\$95.55	\$1,146.60
10"	\$149.25	\$1,791.00
12"	\$214.94	\$2,579.28

⁵ MACW has indicated to Staff that it would prefer its revised Private Fire Protection tariff sheets become effective prior December 15, 2019, assuming no party objects, in order to better incorporate the changes into its current billing practices and issue bills for calendar year 2020.

Respectfully submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 18th day of November, 2019.

/s/ Mark Johnson

Missouri-American Water Company
 Name of Issuing Corporation

For _____

All Missouri Service Areas
 Community, Town or City

Rate F Private Fire Protection								
<p><u>AVAILABILITY</u> – This rate is available for hydrants that are placed on private property and attached to public mains.</p> <p><u>MINIMUM CUSTOMER CHARGE</u> – The minimum charge for water service available through the facilities of the Company for the billing period and for hydrants that are placed on private property and attached to public mains is:</p> <table style="margin-left: auto; margin-right: auto; border: none;"> <thead> <tr> <th style="text-align: left; padding: 5px;"></th> <th style="text-align: center; padding: 5px;"><u>Monthly Billing</u>¹</th> <th style="text-align: center; padding: 5px;"><u>Annual Billing</u>¹</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Per Private Hydrant</td> <td style="text-align: center; padding: 5px;">\$53.70</td> <td style="text-align: center; padding: 5px;">\$644.40</td> </tr> </tbody> </table> <p style="margin-left: 20px; font-size: small;">¹ Monthly billing for all customers, except that customers in St. Louis County may choose annual billing</p>				<u>Monthly Billing</u> ¹	<u>Annual Billing</u> ¹	Per Private Hydrant	\$53.70	\$644.40
	<u>Monthly Billing</u> ¹	<u>Annual Billing</u> ¹						
Per Private Hydrant	\$53.70	\$644.40						
<p><u>PAYMENT TERMS</u> - All bills for service under this schedule will be rendered in advance either on a monthly or on an annual basis. The due date on the tariff shall be ten (10) days after the "date of rendition" of the bill to the customer. The customer's bill will be due and payable after this due date. The delinquent date printed on the bill will not be less than twenty-one (21) days after the date of the postmark of the bill. Any accounts remaining unpaid at the expiration of twenty-one (21) days shall be considered delinquent and the Company may take such action as specified in its filed rules and regulations.</p>								
<p><u>TAXES</u> - These rates do not include any municipal, state or federal taxes computed on either billing or consumption basis. Any such taxes applicable shall be added as separate items in rendering each bill.</p>								

* *Indicates new rate or text*

+ *Indicates change*

Date of Issue: November 8, 2019 Effective Date: December 8, 2019

Issued By: Deborah D. Dewey, President
727 Craig Road, St. Louis, MO 63141

Missouri-American Water Company
 Name of Issuing Corporation

For

All Missouri Service Areas
 Community, Town or City

Rate F
Private Fire Protection

AVAILABILITY – This rate is available for fire protection systems installed on private property. Expense of the installations will be borne by the customer. If, in the opinion of the Company, a detector check meter is needed, the cost shall be a part of the installation. If a detector check meter has to be added to an existing service not having the check meter, the cost will be paid by the customer.

Fire Outlet or Tap Connection Size	Monthly Billing ¹	Annual Billing ¹
2" or Less	\$6.00	\$72.00
3"	\$19.36	\$232.32
4"	\$23.85	\$286.20
6"	\$53.70	\$644.40
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