

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

In the Matter of Missouri-American)	<u>File No. WT-2020-0353</u>
Water Company's Proposed Tariff)	Tracking No. JW-2020-0185
Sheet Filing)	

STAFF REPLY

COMES NOW, Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Recommendation*, states as follows:

1. On April 23, 2020, Missouri-American Water Company ("MAWC" or "Company") filed tariff sheets with an effective date of May 23, 2020, under Tariff Tracking No. JW-2020-0185 with the purpose of making the treatment of the customer service lines in MAWC's St. Louis County service area consistent with the rest of its service areas, and to remove a hindrance to implementing MAWC's Commission-approved lead service line replacement program.

2. Staff sought suspension of the various tariff sheets for further proceedings before the Commission in its May 11, 2020, *Motion to Suspend Tariff Sheets*, and on May 14, 2020, the Commission suspended the tariffs until July 22, 2020.

3. On June 30, Staff filed its *Staff Recommendation*, requesting the Commission approve the tariffs. On June 30, 2020, the Commission issued its *Order Directing Expedited Filing* requiring any objections or response to Staff's recommendation or to the tariffs be filed no later than noon on July 6, 2020.

4. On July 6, 2020, the Office of Public Counsel ("OPC") filed its *Response to Staff's Recommendation*, indicating that it did not object to MAWC's proposed tariffs, but questioned why MAWC was not also seeking to make the treatment of

Private Fire Service Lines and Master Water Service Lines in the Company's Joplin and St. Joseph districts consistent with the rest of its service areas.

5. On July 8, 2020, the Commission issued its *Order Suspending Tariffs and Directing Filing*, further suspending MAWC's tariff sheets submitted under Tariff No. JW-2020-0185 until August 21, 2020, and directing Staff and MAWC to file replies to OPC's *Response to Staff's Recommendation* no later than July 22, 2020.

6. While MAWC's proposed tariff changes submitted under Tariff Tracking No. JW-2020-0185 are specifically intended to harmonize the treatment of service lines in St. Louis County with the rest of its service territories, doing the same for the treatment of Fire Service Lines and Master Service Lines in Joplin and St. Joseph would appear to further the same goal of providing consistency among MAWC's various service territories. MAWC has provided proposed tariff sheets removing the exceptions for the Private Fire Lines and Master Service Lines in Joplin and St. Joseph for Staff's review. As indicated in MAWC's *Reply to Public Counsel's Response to Staff Recommendation*, Staff has no objection to the proposed changes.

WHEREFORE, Staff respectfully submits its Reply to OPC's *Response to Staff's Recommendation* for the Commission's information and consideration.

Respectfully submitted,

/s/ Mark Johnson

Mark Johnson

Deputy Counsel

Missouri Bar No. 64940

P.O. Box 360

Jefferson City, MO 65012

(573) 751-7431 (Telephone)

(573) 751-9285 (Fax)

Mark.johnson@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

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 22nd day of June, 2020.

/s/ Mark Johnson