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 REPLY TO OPC RESPONSE

COMES NOW Missouri-American Water Company ("MAWC" or "Company"), and, as its *Response to OPC Request*, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

- 1. In response to the Commission's *Order Shortening Time to Respond*, the Commission directed that the Office of the Public Counsel ("OPC") "shall file a statement, with specificity, as to the facts or issue and which page and line numbers of testimony are needed from WO-2018-0373 that were not in the record of the current case, WO-2019-0184."
- 2. On May 22, 2019, OPC filed its *Response to Commission Order Directing Filing*. Therein, OPC identified two specific situations where facts are needed (Tr. Vol. 1, 52:16-18; and, finding at para. 20 of the *Report and Order*).
- 3. As to the two specific items identified, MAWC does not object to the use of those two references. However, as to the Transcript reference, MAWC asks that the additional material also include lines 13-15, on page 52 of the Transcript, which contain the following question and answer:
 - Q. Carryover means you're bringing forward from
 - 14 year to year?
 - 15 A. Correct.

This additional reference provides the context for Mr. Wilde's statement in that it shows the subject of the question and answer related to the net loss carryover (or forward), and not the net operating losses directly associated with the ISRS plant.

WHEREFORE, MAWC submits this *Reply to OPC Response* for the Commission's consideration.

Respectfully submitted,

William R. England III, MBE #23975
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

Oller-

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

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

l hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 23rd day of May, 2019, to:

Mark Johnson
Casi Aslin
Office of the General Counsel
staffcounselservice@psc.mo.gov
casi.aslin@psc.mo.gov
mark.johnson@psc.mo.gov

Lera Shemwell Office of the Public Counsel opcservice@ded.mo.gov lera.shemwell.ded.mo.gov

D1.Com