## 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-2022-0176
Approval to Change a Water and Sewer	)		YW-2023-0019
Infrastructure Rate Adjustment (WSIRA).	)		YS-2023-0020

## **MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** Missouri-American Water Company ("MAWC"), and for its *Motion for Expedited Treatment* pursuant to Commission Rule 20 CSR 4240-2.080(14), respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. MAWC filed its WSIRA petition on March 4, 2022. By an Order Approving Agreement ("Order") issued July 21, 2022, the Commission approved additional annual WSIRA surcharge revenues of \$15,373,804 for St. Louis County water, \$2,235,288 for All Other water, \$13,917 for Arnold sewer, and \$189,503 for All Other sewer for a total of \$17,812,512, and authorized MAWC to file tariff sheets to recover WSIRA revenues and rates as set out in the exemplar tariff sheets attached to the Notice of Agreement as Appendix B.

2. The revised WSIRA tariff sheets, Tracking Nos. YW-2023-0019 and YS-2023-0020, are attached hereto. Although the tariffs bear an effective date 30 days after issuance, MAWC requests that the tariffs be allowed to take effect for service rendered on and after August 11, 2022, or as soon thereafter as is reasonable.

3. Pursuant to Commission Rule 20 CSR 4240-2.080(14), MAWC submits that the tariff sheets are being filed in compliance with the Commission's *Order*; and the tariff sheets would implement rates in accordance with Sections 393.1000-1006, RSMo. in regard to plant that has been placed into service between November 1, 2021 and April 30, 2022, and is currently used

and useful and providing service to customers. Therefore, a grant of this Motion would provide rate recognition of this plant at a rate recognized by statute and is in the public interest. MAWC further states that this Motion is being filed as quickly as possible after the Commission issued its Order.

WHEREFORE, MAWC respectfully requests an order of the Commission granting this motion and allowing the revised WSIRA tariff sheets, Tracking Nos. YW-2023-0019 and YS-2023-0020 to take effect for service rendered on and after August 11, 2022, or as soon thereafter as is reasonable. MAWC requests such additional relief as is necessary or appropriate under the circumstances.

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 Respectfully Submitted,

Timothy W. Luft, MBE #40506 Rachel L. Niemeier MBE # 56073 Corporate Counsel MISSOURI-AMERICAN WATER COMPANY 727 Craig Road St. Louis, MO 63141 (314) 996-2279 timothy.luft@amwater.com Rachel.niemeier@amwater.com

## ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 22<sup>nd</sup> day of July, 2022 to:

Don Cosper Staff Counsel's Office <u>don.cosper@psc.mo.gov</u> <u>staffcounselservice@psc.mo.gov</u>

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