

In the Matter of Missouri-American)
Water Company's Infrastructure) **Case No. WR-2011-0336**
System Replacement Surcharge (ISRS))

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and on behalf of Missouri-American Water Company (Company or MAWC) (referred to Jointly as the Parties) and files this *Joint Motion for Clarification (Joint Motion)* with the Missouri Public Service Commission (Commission), respectfully stating the following:

1. On June 22, 2011, MAWC filed *MAWC's Petition to Change its Infrastructure System Replacement Surcharge (ISRS) (Petition)*.
2. On August 29, 2011, Staff filed its *Staff Recommendation (Recommendation)* with attached work papers as attachments A and B in this matter.
3. On September 15, 2011, MAWC filed a *Notice of Agreement* stating that it does not object to Staff's recommended adjustment found in Attachment A and B of the *Staff's Recommendation*.
4. On September 28, 2011, the Commission issued an *Order Approving Petition for Change of Infrastructure System Replacement (Order)*.
5. Upon review of the *Order* and *Staff's Recommendation*, the Parties request the Commission clarify the *Order* as recommended below.
6. The Commission's *Order*, under the heading "Staff Recommendation", states: "However, based on Staff's calculation of the revenue requirement, the ISRS revenue should be designed to recover \$2,180,819, rather than \$2,712,260 requested by Missouri-American."

The Parties recommend that the *Order* be modified as follows:

“However, based on Staff’s calculation of the revenue requirement, the ISRS revenue should be designed to recover \$2,180,730 rather than \$2,712,260 requested by Missouri-American.”

This change will allow the *Order* to reflect the number provided in Staff’s work papers and agreed upon by Missouri-American, though erroneously identified as \$2,180,819 in paragraph 4 of *Staff’s Recommendation*.

7. In the Discussion Section of the Commission’s *Order*, the Commission provides the following table, and states that these are the rates determined by Staff and to which the Company agree:

Rate Class	Rates per CCF	Rates per 1,000 Gallons
Rate A Customers	\$ 0.0423	\$ 0.0562
Rate B Customers	\$ 0.0008	\$ 0.0010
Rate J Customers	\$ 0.0004	\$ 0.0005
Rate K Customers	\$ 0.0423	\$ 0.0562

The Parties agree that the amount identified in the table above (and included in *Staff’s Recommendation*) were meant to reflect the incremental increase in rates from the current amount, not the amount of the new ISRS rate. As such, the Parties present the following table which demonstrates the current rates, as well as the rates that should result from this case in order to more accurately and directly reflect the Parties’ understanding in this case.

New ISRS Rates (Existing Rates Plus Additional Rates Calculated Above):

Rate Class	ISRS Recovery Requirement	Current Rates per CCF	New Rates per CCF	Current Rates per 1,000 Gallons	New Rates per 1,000 Gallons
Rates A & K	\$ 2,176,507	\$ 0.0697	\$ 0.1120	\$ 0.0929	\$ 0.1491
Rate B	\$1,620	\$ 0.0067	\$ 0.0075	\$ 0.0089	\$ 0.0099
Rate J	\$2,603	\$ 0.0034	\$ 0.0038	\$ 0.0045	\$ 0.0050
Total	\$ 2,180,730				

8. The undersigned counsel has obtained permission from MAWC's attorney to file this Joint Motion on behalf of MAWC.

WHEREFORE, Staff respectfully submits this *Joint Motion* for the Commission's information and consideration and respectfully requests that the Commission issue an order clarifying the matters addressed above.

Respectfully submitted,

/s/ Rachel M. Lewis

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CERTIFICATE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 29th day of September, 2011.

/s/ Rachel M. Lewis