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Exhibit No.:

Issues:

Description of MAWC and Operating

Facilities, Tank Painting Tracker

Adjustment, Various Activity Fees

Witness:

Greg A. Weeks

Exhibit Type:

Direct

Sponsoring Party: Missouri-American Water Company

Case No.:

WR-2011-0337 SR-2011-0338

Date:

June 30, 2011

#### MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2011-0337 CASE NO. SR-2011-0338

**DIRECT TESTIMONY** 

OF

**GREG A. WEEKS** 

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

MAUL Exhibit No. 30
Date 2-21-12 Reporter L
File No WR-2011-0337

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### OF THE STATE OF MISSOURI

IN THE MATTER OF MISSOURI-AMERICAN WATER COMPANY FOR AUTHORITY TO FILE TARIFFS REFLECTING INCREASED RATES FOR WATER AND SEWER SERVICE

CASE NO. WR-2011-XXXX CASE NO. SR-2011-XXXX

#### **AFFIDAVIT OF GREG A. WEEKS**

Greg A. Weeks, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Greg A. Weeks"; that said testimony and schedules were prepared by him and/or under his direction and supervision; that if inquires were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge.

Greg A. Weeks

State of Missouri County of St. Louis

SUBSCRIBED and sworn to

Before me this \_\_\_\_ day of \_\_

**\_ 2011.** 

**Notary Public** 

My commission expires:

STACI A. OLSEN
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County

Commission Number 09519210
My commission expires March 20, 2013

## DIRECT TESTIMONY GREG A. WEEKS MISSOURI-AMERICAN WATER COMPANY CASE NO. WR-2011-0337 SR-2011-0338

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1		DIRECT TESTIMONY
2		Greg A. Weeks
3		
4		I. WITNESS INTRODUCTION
5	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
6	A.	My name is Greg A. Weeks and my business address is 727 Craig Road
7		St. Louis, Missouri 63141.
8		
9	Q.	WHAT POSITION DO YOU HOLD WITH MISSOURI-AMERICAN
10		WATER COMPANY?
11	A.	I am the Vice President of Operations for Missouri-American Water
12		Company ("MAWC" or the "Company").
13		
4	Q.	WHAT DO YOUR JOB RESPONSIBILITIES INCLUDE?
15	A.	I am responsible for the day-to-day development, management and
6		operations of the Company's water and wastewater districts, which include
7		the treating and furnishing of potable water; collection, treating and
8		discharging of waste water; the provision of customer service; the safety
9		and continuity of the Company's operations; and the upkeep and
20		maintenance of the Company's facilities. I am responsible for the
2]		personnel employed within the Operations function as well as the
22		development and maintenance of productive personnel relations within

Operations and between Operations and the other functions with which it

interacts. I am responsible for maintaining contact with local government officials regarding operational issues, business representatives, and civic organizations. I also supervise the annual budgets covering capital investments and operation and maintenance expenditures and the construction of facilities occurring under the management of Operations employees. Additionally, I have the responsibility of controlling such expenditures upon their authorization by the Board of Directors. Finally, it is my responsibility to supervise water quality, production, distribution, and customer service activities, and procedures and to ensure their effectiveness.

#### 12 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

 A. I received a Bachelors of Science degree in Civil Engineering in 1980 from the University of Missouri – Rolla and a Masters in Business
 Administration from Saint Louis University in 1996.

Α.

#### Q. PLEASE OUTLINE YOUR BUSINESS EXPERIENCE.

In 1981, I began my career with Exxon Co. USA located in Midland, Texas. I worked in various assignments from 1981 through 1987 as a District Reservoir Engineer, in Regulatory Affairs on both oil and gas regulation and environmental permitting, and as an engineer on a tertiary recovery pilot project. I went to work for St. Louis County Water Company in 1987 in the Engineering department primarily working on water main

design and construction management. In 1990, I moved to St. Louis County's System Operations group and focused on hydraulic modeling, control systems, and tank & booster design and construction. In 1992, I was promoted to Plant Engineer responsible for daily operation, capital and operating budgets, and personnel for the 40 MGD South County Plant. In 1994, I was promoted to Operations Superintendent over the System Operations department and managed the daily operation, control, budgets, and hydraulics of the St. Louis County system. During this period St. Louis County Water Company was acquired by American Water Works Company, Inc. ("American Water") and became part of the MAWC. In 2002, I was promoted to Manager of Southwest Operations in Joplin. There I was responsible for all aspects of operations of the Joplin system. Included in this responsibility was leading the effort to build a regional approach to addressing the long term source of supply needs in a three state area. In 2004, I was promoted to General Manager of Network operations for MAWC responsible for all aspects of operations for the ten water and three waste water districts in Missouri. In 2009, I became Vice President of Operations, maintaining the responsibilities of my previous position and adding responsibility for the Production, Water Quality, and Environmental areas of the operation.

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#### Q. ARE YOU A MEMBER OF ANY PROFESSIONAL ORGANIZATIONS?

1	A.	Yes, I am a member of the American Water Works Association. I am a
2		registered Professional Engineer in the states of Missouri and Texas and I
3		hold my Class A and DS III Water Licenses from the Missouri Department
4		of Natural Resources.
5		
6	Q.	HAVE YOU TESTIFIED BEFORE ANY REGULATORY COMMISSIONS?
7	A.	Yes. As part of my assignment with Exxon, I testified before the oil & gas
8		regulators in Texas, Oklahoma, Wyoming, and New Mexico. I have also
9		testified before the Missouri Public Service Commission in prior rate
10		cases.
11		
12	Q.	WHAT ARE THE SUBJECTS FOR WHICH YOU WILL BE PROVIDING
13		TESTIMONY?
14	A.	I will discuss the following subjects:
15		Description of MAWC and its operating facilities;
16		2. Tank Painting Tracker adjustment; and,
17		3. Fees for various activities, such as service activation,
18		discontinuance for non-pay, returned payments, etc.
19		
20		II. DESCRIPTION OF MAWC AND OPERATING FACILITIES
21	Q.	PLEASE DESCRIBE MAWC.
22	A.	MAWC provides water and /or waste water utility service to over 457,600
23		customers in and around over 100 communities throughout the State of

Missouri. We provide water service to districts ranging in size from St.
Louis Metro (largest) to Lakewood Manor (26 customers). We also provide
sewer utility service in our Parkville, Warren County, Cedar Hill, and the
numerous former Aqua Missouri operations.

- Q. PLEASE GENERALLY DESCRIBE MAWC'S PLANT AND PROPERTY,
   AS OF DECEMBER 31, 2010.
- As of December 31, 2010, the Company's utility plant accounts included land and land rights, structures and improvements, collecting and impounding reservoirs, wells, pumping equipment and associated facilities, purification plant and equipment, sludge disposal facilities, transmission and distribution mains, collection pipes, distribution storage facilities, service lines (excepting those in St. Louis County), meters, hydrants and other facilities, including materials and supplies.

- Q. PLEASE GENERALLY DESCRIBE MAWC'S SOURCES OF WATER SUPPLY, TREATMENT FACILITIES, PUMPING EQUIPMENT AND DISTRIBUTION SYSTEM PROPERTY.
- A. MAWC draws water for our water districts from surface supplies, wells and/or infiltration galleries. About 87% of the total source of supply comes from surface supply and 12% comes from wells and infiltration galleries. The remaining 1% is purchased water. Eleven water treatment facilities produced an average of over 203 million gallons daily from January 1,

2010 through December 31, 2010, or approximately 74 billion gallons annually. The plants provide various types of treatment appropriate for The treatment processes include sedimentation and each supply. filtration, clarification, disinfection, taste and odor removal, organic chemical absorption, iron and manganese removal or sequestering, pH adjustment, corrosion control, and fluoridation for dental prophylaxis, all in order to meet or exceed the standards of the drinking water regulations of the Drinking Water Branch of the Missouri Department of Natural Resources (MoDNR), the United States Environmental Protection Agency (EPA), municipal and county fluoridation ordinances, and a municipal water softening franchise requirement. The Company has in excess of 5,700 miles of transmission and distribution mains ranging in size from 1inch to 42-inch diameter. The Company has over 41,000 fire hydrants available for public fire service. 70 potable water storage tanks (not including plant wash water tanks), with total capacity of approximately 143 million gallons, are strategically located in the service areas for drawdown during peak demand periods and for fire protection services.

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### Q. PLEASE GENERALLY DESCRIBE MAWC'S WASTEWATER OPERATIONS.

A. MAWC continues to operate a wastewater collection system in the Platte
County Operation and wastewater collection and treatment systems in the
Cedar Hill and Warren County Operations. Recently MAWC has added

48 waste water collection and treatment systems acquired from Aqua Missouri. The waste water system facilities consist of approximately 24 miles of collection mains ranging in size from 2-inch to 10-inch diameter. There are over 700 manholes and 21 lift stations in these systems. These plants have a capacity of over 300,000 gallons of waste water daily. There exist a total of 39 mechanical waste water treatment plants and 13 lagoons.

A.

#### Q. WHAT IS THE CONDITION OF MAWC'S UTILITY PROPERTY?

MAWC maintains its water and waste water utility properties in a good state of operating condition for the rendering of water and waste water utility service. The reports of inspections conducted by the Missouri Department of Natural Resources (DNR) confirm the Company's operations are in compliance with state and federal drinking water and waste water laws and regulations. Kevin Dunn's Direct Testimony contains information regarding the Company's capital investment activities that, in addition to utility property maintenance and operation, are critical to the provision of safe and adequate water and waste water utility service.

### Q. ARE ALL OF THE FACILITIES THAT ARE INCLUDED IN THE UTILITY PLANT ACCOUNTS OF MAWC IN SERVICE AND REASONABLY

### NECESSARY FOR THE PROVISION OF SAFE AND ADEQUATE

#### WATER AND WASTE WATER SERVICE?

A. Yes. All of MAWC's property is necessary for and is being used to fulfill the Company's responsibility to provide safe and adequate water and waste water utility service.

A.

#### III. TANK PAINTING TRACKER ADJUSTMENT

#### Q. WHAT IS THE TANK PAINTING TRACKER?

The Tank Painting Tracker ("Tracker") is a form of accounting treatment that allows for tank painting expense to be tracked and identified separately from other items of expense. More specifically, the Tracker facilitates direct auditing of Company financial records to determine its level of expenditures over time on the repainting of its tanks.

A.

#### Q. HOW DOES THE TRACKER WORK?

The Tracker is currently set at an average level of expenditure on tank painting of \$1,000,000 per year. If the Company is expending funds on tank painting at the average rate of \$1,000,000 per year, this liability (or asset) has a value of zero at the end of the year. Upon inspection of the Company's financial records, the Company's amount of expense on this category of maintenance can readily be determined from the value of the Tracker liability (asset) account.

#### Q. WHAT IS THE PURPOSE OF THIS TRACKER?

A. From one rate filing to the next there is the opportunity to review the balance in the Tracker liability (asset) account and determine how to address this amount. This Tracker mechanism acts as an incentive to the Company to make sure it expends the average of \$1,000,000 per year on tank painting and protects the customer, if the Company spends less than \$1,000,000 on tank painting.

A.

#### Q. WHY IS A TRACKER MECHANISM APPROPRIATE?

The seasonal timing of tank painting and variability from year to year of the tanks to be painted makes the tracker a good mechanism to establish average annual expenditures that may not be accurately captured in a calendar or "test" year. With tanks ranging in capacity from 11,000,000 gallons to 50,000 gallons, there can be wide swings in the cost from one year to the next. In addition, in terms of scheduling, tank painting needs to be completed in the spring and fall when weather and water delivery to our customers allows the work to be done. An extended hot and dry fall, for instance, could delay fall tank painting and push it into the following year. Conversely, a cold and wet summer could allow work to proceed deeper into summer. The flexibility required to accommodate these operational constraints can move costs from month to month and thus could impact test year or calendar year analysis.

## Q. WHY IS IT IMPORTANT THEN THAT THE AUTHORIZED AMOUNT OF THE TRACKER BE COMMENSURATE WITH THE ANNUAL LEVEL OF EXPENDITURES?

The existence of the tracker is important as a protection for both the customer and MAWC. It is intended to act as a balancing mechanism to insure that the costs of the tank painting program and only the costs of that program, are appropriately recovered. If the tracker is set substantially below the level of annual expenditures, however, the regulatory asset will continue to grow from year to year and future customers will be expected to pay for costs that should be borne by existing customers. The converse would be true if actual tank painting were below the tracker level on an ongoing basis. In this case, we know that both current and future expenditures will exceed the existing tracker level.

Α.

## Q. DOES THE CURRENT TRACKER ENCOURAGE AN OPTIMAL LEVEL OF TANK PAINTING ACTIVITY?

18 A. No. The current Tracker only encourages the Company to spend \$1,000,000 per year on tank painting. A tank painting expenditure of \$1,000,000 is not the optimal level of annual tank painting activity.

### Q. DOES THE COMPANY BELIEVE THERE IS A DIFFERENT VALUE AT WHICH THE TRACKER SHOULD BE SET THAT BETTER MATCHES

# THE VALUE OF ANNUAL TANK PAINTING EXPENSE WITH THE OPTIMAL LEVEL OF TANK PAINTING ACTIVITY APPROPRIATE FOR THE COMPANY'S TANKS AND IF SO WHAT IS THAT VALUE?

Yes, the Company believes that, based on 2010 pricing, a value for the Tracker of \$1,761,000 per year supports an optimal ongoing level of average annual tank painting activity. However, the Company in its filing has reflected the establishment of a tracker level based solely on anticipated 2011 tank painting costs of \$1.6 million and requests that this level be trued-up based on the actual committed tank painting costs for the calendar year 2011.

Α.

Α.

#### Q. HOW WAS THE OPTIMAL ANNUAL AMOUNT CALCULATED?

This amount was derived by first calculating the total cost to paint all the Company's tanks. This was done by estimating the cost to paint the interior and exterior surfaces of each tank based on the unique features of each tank such as tank type (i.e. riveted or welded steel), tank surface area, and whether it is an elevated or ground tank. The tank interior cost estimates were added together to arrive at a total estimated cost to paint all tank interior surfaces of \$11,943,000. The tank exterior surface cost estimates were added together to arrive at a total estimated cost to paint all tank exterior surfaces of \$7,376,000. These expense totals were then divided by the total number of tanks including plant wash water tanks in the Company's districts (80) to arrive at an average per tank interior

surface painting expense of \$149,000 and exterior surface painting expense of \$92,000.

Determining the average total annual level of expense to maintain the surfaces of the Company's tanks requires a determination of the average life expectancy per paint coating. Like the estimated cost to paint each tank's interior and exterior surfaces, each tank's unique aspects were considered, most importantly its existing coating type. For example, all other things being equal, if a tank's interior coating was epoxy paint it was assigned a different life expectancy from that of an exterior surface coated with acrylic paint. After assigning life expectancies to each tank's interior surface the sum of these life expectancies was divided by the Company's total number of tanks (80) to arrive at an average tank interior paint coating life expectancy of 14 years. Similarly, an average tank exterior paint coating life expectancy of 9.5 years was calculated.

By dividing the number of tanks in the Company's districts (80) by the calculated average life expectancy of a tank interior paint coating of 14 years the Company calculated an average of 6 tank interiors per year to be painted such that, on average, tank interior surfaces are being repainted on a frequency that equals their life expectancies. Similarly, with an average tank exterior paint coating life expectancy of 9 years the calculated average number of tank exterior surfaces per year to be painted is 9.

By multiplying the average tank interior surface painting expense (\$149,000) by the average number of tank interior surfaces per year to be painted (6), an average total annual tank interior painting expense of \$894,000 results. By applying this same calculation with respect to tank exterior surfaces, an average total annual tank exterior painting expense of \$828,000 results.

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In addition to direct tank painting expense, there is the annual expense of what is termed as washout & inspection of the tank interior and visual inspection of tank exterior coatings not under warranty to determine their condition. As determined by the method described above, by multiplying the average annual number of tank interiors to be painted (6) by the warranty period in years (5) for each tank, as part of a continuous process of tank painting, this results in 30 tank interiors under warranty in any given year. By subtracting the number of tank interiors under warranty (30) from the total number of tanks in the Company's districts (80) this leaves an average of 50 tank interiors that each should receive inspection on a By dividing the number of tank interiors not under four year cycle. warranty (50) by the period in years between interior tank inspections (4) this results in the need for an average of 12.5 washouts & inspections of tank interiors per year. By multiplying the cost per washout & inspection (\$3,108) by the average number of washouts & inspections to be conducted each year (12.5) the average total annual washout & inspection expense is \$38,850. The sum of these average total annual inspections

2		maintenance expense of \$1,760,850, based on 2010 pricing.
3		
4	Q.	DOES MAWC BELIEVE \$1,000,000 PER YEAR OF TANK PAINTING
5		EXPENSE IS REPRESENTATIVE OF THE LEVEL OF EXPENSE IT
6		WILL INCUR GOING FORWARD FROM THE DATE OF THE ORDER IN
7		THIS RATE CASE?
8	A.	No. As mentioned previously in this testimony the figure of \$1,000,000 is
9		based on 2007 pricing and fewer tanks painted per year. MAWC believes
10		its tank painting costs going forward from the order in this rate case will be
11		higher in order to keep more tanks painted on schedule and reflect the
12		cost increases of inputs such as labor, materials, and fuel.
13		
14	Q.	DOES MAWC HAVE AN ESTIMATE OF WHAT IT EXPECTS THE
15		VOLUME OF TANK PAINTING ACTIVITY DESCRIBED IN THIS
16		TESTIMONY TO COST GOING FORWARD FROM THE DATE OF THE
17		ORDER IN THIS RATE CASE?
18	A.	Yes, MAWC estimates the same volume of tank painting activity
19		expressed as \$1,761,000 in 2010 pricing will cost approximately
20		\$1,814,000 in 2011 pricing.
21		
22	Q.	DOES MAWC EXPECT THE 2011 PRICING TO BE KNOWN ON OR
23		BEFORE THE TRUE-UP DATE IN THIS CASE?

and painting expenses produces an average grand total annual tank

1	A.	Yes. In addition, MAWC expects to have completed work for its 2011 tank
2		painting projects on or before the true-up date for this rate case.

3

- Q. DOES MAWC EXPECT TO TRUE-UP ITS FILING IN THIS RATE CASE
  WITH RESPECT TO THE VALUE OF THE TANK PAINTING TRACKER
  BASED ON THE PRICES SPECIFIED IN THE TANK PAINTING
  CONTRACTS IT EXPECTS TO EXECUTE ON OR BEFORE THE TRUEUP DATE FOR THIS RATE CASE?
- 9 A. Yes.

10

11 Q. WHAT INDICATIONS CAN THE COMPANY PROVIDE THAT GOING
12 FORWARD FROM THE DATE OF THE ORDER IN THIS RATE CASE IT
13 WILL, ON AVERAGE, COMPLETE THE OPTIMAL ANNUAL LEVEL OF
14 TANK MAINTENANCE?

23

First, the Company is currently completing its 2011 tank painting projects and plans to have those projects completed by the year end. Although the Tracker is currently set at a value of \$1,000,000 annually, the level of tank painting expense the Company completed in 2010 was \$1,400.000. The Company completed \$1,606,000 in tank painting in 2009. Using this approach, Staff will be able to verify that the level of tank painting expense incurred by the Company in 2009 and 2010 far exceeds the \$1,000,000 currently assigned to the Tracker. Second, as mentioned above, the Company has executed contracts with painting contractors for the

performance of its 2011 spring tank painting projects and has expended \$405,699 as of June 1<sup>st</sup>. In addition, the Company will be executing contracts for the fall tank painting for an additional outlay of well over a million dollars on or before the proposed true-up date in this case. Going forward, the Company anticipates contracting for a volume of tank painting activity equivalent to that supported by the \$1,761,000 at 2010 pricing, contingent upon regulatory approval of a Tracker value approximately equal to that value.

Third, as stated previously in this section of my testimony, by the very nature of the Tracker, the Company is encouraged to incur an average annual tank painting expense equal to the value of the tracker, no more and no less.

Α.

### Q. IN SUMMARY, WHAT DOES THE COMPANY BELIEVE TO BE AN OPTIMAL VALUE AT WHICH TO SET THE TRACKER?

The optimal value at which to set the Tracker is that value that supports an average tank painting frequency that matches the average life expectancy of a tank's paint coating. On average, for MAWC, that value is \$1,761,000 at 2010 prices and may very well be a higher value based on contracts MAWC executes prior to the true-up date. In addition, the recent closing of the Aqua Missouri properties will cause some additional tank painting costs but those have not yet been integrated into the MAWC tank painting schedule. This is an average year to year amount required but based on

the size and type of tanks coated in a given year the actual costs can vary significantly up or down. As a reasonable balance between fair cost recovery and customer protection, the Company proposes the establishment of the new tracker value at the annual level of tank painting committed by the Company as of the proposed true-up date in this case.

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#### V. VARIOUS ACTIVITY FEES

#### 8 Q. ARE CUSTOMER RATES FOR OTHER ACTIVITIES BEING

#### 9 ADJUSTED?

10 A. Yes, the fees for items like service activation, disconnection for non-pay,
11 returned payment charges, etc. have been reviewed and adjusted as per
12 Schedule GAW-1.

13

14

#### Q. ARE CUSTOMER FEES FOR VARIOUS ACTIVITIES CONSISTENT

#### 15 **AND COST BASED?**

16 A. Yes. The actual costs associated with these activities were evaluated on
17 a district by district basis. We found that these district specific costs were
18 relatively similar so we are proposing to establish the same rates for these
19 activities regardless of district.

20

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#### Q. DOES THAT CONCLUDE YOUR TESTIMONY?

22 A. Yes.

#### Missouri American Water Company Case No. WR-2010-0131 Changes in Miscellaneous Fees per Stipulation and Agreement

	Brunswick		Jefferson City		Joplin		Mexico		Parkville Water		St. Joseph		St. Louis Metro		Warren County Water		Warrensburg		S	2011 Statewide	
		Current Rate	STATE OF THE PARTY	Current Rate		Current Rate		Current Rate	W. S. (1)	Current Rate		Current Rate		Current Rate	100	Current Rate		Current Rale		Jew	Rote
Connection Fee / Turn on Fee	<b>5</b>	21,00	\$	21.00	s	21,00	5	21,00	5	21,00	5	21,00	s	25.00	5	25.00	5	21,00	<b>5</b> .		28,00
Connection Fee / Turn on Fee (overtime)	3	125.00	\$	125.00	s	125.00	\$	125.00	s	125.00	\$	125.00	s	150.00	s	150,00	\$	125.00	•		131,00
Turn on Non-pay Fee (Regular Hours)	\$	42.60	\$	42,00	5	42.00	5	42.00	s	42.00	\$	42.00	s	50,00	\$	50.00	3	42.00	5		57.00
Turn on Non-pay Fee (After Hours)	s	126.00	\$	125.00	s	125.00	s	125.00	5	125.00	\$	125.00	s	150.00	\$	150.00	s	125.00	\$		131.00
Returned Check Fee	5	12,00	\$	12,00	\$	12.00	\$	12.00	s	12,00	\$	12.00	5	12,00	\$	12,00	\$	12.00	\$		12.00
Hydrant Inspection Fee	5	15.00	\$	15.00	3	15.00	\$	15.00	s	15.00	\$	15.DQ	\$	15.00	s	15.00	\$	15.00	Į.		15.00
Hydrant Usage Permit	5	110.00	5	110.00	5	110.00	\$	110.00	3	110.00	ş	110.00	\$	110.00	3	110.00	\$	110,00	\$		150.00
Meter Testing Fee (If moter tested within previous 12 months)	3	62.00	\$	62.00	s	62.00	\$	62.00	5	62.00	s	62.00	\$	75.00	\$	75.00	s	62.00	\$		
Service Line Inspection Fee	s	21,00	5	21,00	\$	21,00	\$	21.00	5	21,00	\$	21.00	\$	25.00	5	25.00	3	21.00	\$		
Following apply to St. Louis Metro and Warren County Water Districts Only																					
Temporary Service Fee													5	81.00	s	61,00			5		
Rescheduled Taps Fee													5	85.00	5	65.00					
Leaking Service Line Fee (Regular Hours)													\$	31.00	s	31,00			5		
Leaking Service Line Fee (After Hours)													5	15D.D <b>0</b>	s	150.00					