

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

In the Matter of Missouri-American Water)
Company's Request for Authority to)
Implement a General Rate Increase for)
Water and Sewer Services Provided in)
Missouri Service Areas.)

Case Nos. WR-2011-0337
SR-2011-0338

STAFF'S RESPONSE
TO THE OFFICE OF PUBLIC COUNSEL'S REQUEST FOR CLARITY

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and submits to the Missouri Public Service Commission (Commission) the following *Staff's Response to the Office of the Public Counsel (Public Counsel)'s Request for Clarity (Response)*:

1. December 19, 2011, Staff filed a *Status Report, Request for Extension of Time, and Request for Company Response (Status Report)*.

2. The *Status Report* included the following language:

Staff has routed some of the inquiries it has received to the Office of the Public Counsel (Public Counsel), the party who requested the customer comment cards be distributed in this matter, only to have those same inquiries returned for action by Commission's Consumer Services Staff. Inquiries that were sent to Public Counsel generally relate to matters typically handled by Public Counsel, such as questions inquiring as to who represents customers in the rate case process.

3. The Manager of the Consumer Services Division was routed a public comment card that did not contain the case number, as is typical of public comments that do not have a case number associated with it. This public comment was routed from Public Counsel and is the reason for including the above-referenced paragraph in its *Status Report*. Due to the volume of comment cards, which to date exceeds 11,000, and returned envelopes received by Staff, a mistake was made prior to Staff's filing of the *Status Report*.

4. Upon an in-depth review, which included a search from the Commission's Information Services Department, Staff determined that the discrepancy resulted from the entry format used by Public Counsel in this matter. Typically, Public Counsel enters comments in EFIS in a manner different from Staff's Consumer Services Department. Staff enters the initials of the Staff member entering the public comment, a brief repeat or description of the comments made by the customer and then "see attached" in the comment area. Whereas Public Counsel generally completes the public comment fields and types "see attached" in the comment area, but this did not occur in this instance. In this case, Public Counsel replicated the same format as Staff and therefore a mistake was made in deciphering which person routed the public comment. The entry format caused confusion in the routing due to identical initials, "CB", used by Commission Staff and Public Counsel.

5. Staff has spoken with Public Counsel and clarified the error so that it may be avoided in the future and further apologizes for any miscommunication with the Commission, understanding that Staff believed the filing to be accurate at the time of filing.

WHEREFORE, Staff respectfully submits this *Response* for the Commission's information and consideration.

Respectfully submitted,

/s/ Rachel M. Lewis

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CERTIFICATE OF SERVICE

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 December, 2011.

/s/ Rachel M. Lewis