

**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)	Case Nos. WR-2015-0301
Increase for Water and Sewer Service Provided in)	and SR-2015-0302
Missouri Service Areas)	

**STATEMENT OF POSITIONS
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers ("MIEC") and submits its Statement of Positions on the following issues:

3. Revenue Stabilization Mechanism Proposal

Should the Commission adopt the Revenue Stabilization Mechanism proposed by MAWC?

MIEC Position: No.

6. Environmental Cost Adjustment Mechanism ("ECAM") Proposal

Should an ECAM be approved in this case as proposed by MAWC and, if so, what conditions, if any, should be implemented?

MIEC Position: No.

31. District Consolidation/Consolidated Pricing

Should the Commission adopt the consolidation of districts proposed by Staff, the alternative consolidation proposed by MAWC, or maintain the status quo as proposed by OPC?

MIEC Position: No.

32. Rate Design & Customer Charge

C. How should purchased power expense be allocated?

MIEC Position: MIEC recommends the same allocation factor used to allocate other pumping expenses and the rate base associated with electric pumping equipment, Factor 3, be used to allocate purchased power expense

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Edward F. Downey

Edward F. Downey, # 28866
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone: (573) 556-6622
Facsimile: (573) 556-7442
E-mail: efdowney@bryancave.com

Diana M. Vuylsteke, # 42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2543
Facsimile: (314) 259-2020
E-mail: dmvuylsteke@bryancave.com

Attorneys for the Missouri Industrial
Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 11th day of March, 2016, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey