

**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 No. WR-2010-0131

STAFF MOTION TO ESTABLISH TRUE-UP PERIOD AND ACCOUNTS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and for its *Motion* respectfully states the following to the Missouri Public Service Commission (“Commission”): On December 11, 2009, *Staff’s Test Year, True-Up, And Consolidation Recommendations* requested the Commission allow the Staff until the filing of its direct testimony to determine whether or not to recommend a true-up, as it could not provide an informed recommendation until after a substantial audit of Missouri-American Water Company’s (“Missouri-American” or “Company”) books and records.

2. The Commission’s January 13, 2010 *Order Adopting Procedural Schedule* allowed the parties until March 29, 2010, to file motions regarding any true-up period.

3. The Staff filed direct testimony on March 9 and 26, 2010. From its review of the Company’s records, the Staff moves for the Commission to set a true-up period of April 30, 2010, for the following items: Plant in Service, Depreciation Reserve, Deferred Taxes, Related Cash Working Capital Effects, Materials and Supplies, Prepayments, Customer Advance for Construction, Pension and OPEB Trackers, Tank Painting Tracker, Other Deferred Regulatory Assets and Liabilities, Rate of Return, Capital Structure, Revenues for Customer Growth, Payroll-Employee Levels and Wage Rates and Related Benefits, Rate Case Expense, Bad Debt Expense, Depreciation and Amortization Expense, Related Income Tax Effects,

Pensions and OPEBs, Injuries and Damages, Property Taxes, PSC Assessment, Fuel and Power Expenses, Chemical Expense, Purchased Water Expense, and Tank Painting Expense.

WHEREFORE, the Staff moves for the Missouri Public Service Commission to adopt a true-up period of April 30, 2010, subject to the accounts listed in Paragraph three (3) above.

Respectfully submitted,

/s/ Jennifer Hernandez

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel/parties of record this 29th day of March 2010.

/s/ Jennifer Hernandez