

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

In the Matter of Missouri-American Water Company    )  
Request for Authority to Implement a General Rate    )  
Increase for Water and Sewer Service Provided in    )  
Missouri Service Areas    )    **Case No. WR-2015-0301**

**STAFF RESPONSE TO REQUEST FOR LATE-FILED EXHIBIT**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and as its Response to the Commission’s request for a late-filed exhibit states as follows:

1. During an Agenda meeting regarding this matter, Chairman Hall requested filing of a late-filed exhibit containing customer usage data for Missouri-American Water Company (MAWC).

2. MAWC provided Staff with customer usage data, which Staff has reviewed and attached hereto.

3. As noted in both the pre-filed testimony and evidentiary hearing in this matter, MAWC experienced meter issues. Staff does not know the extent to which the referenced meter issues affected the customer usage data MAWC provided to Staff.

4. Staff is agreeing with MAWC’s customer usage data for the sole purpose of providing the Commission with this requested late-filed exhibit.

5. As MAWC provided the customer usage data, MAWC is best suited to answer any questions regarding the attached exhibit.

**WHEREFORE**, Staff submits its late-filed exhibit and respectfully requests the Commission consider this filing to comply with its request.

Respectfully submitted,

**/s/ Jamie S. Myers**

Jamie S. Myers

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**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 28<sup>th</sup> day of April, 2016.

**/s/ Jamie S. Myers**

**Missouri-American Water**  
**Consumption levels in thousand gallons**

	Actual 2009	eff 7/1/2010 2009 Rate Case Authorized	Actual 2010	Actual 2011	eff 4/1/2012 2012 Rate Case Authorized	Actual 2012	Actual 2013	Actual 2014	Actual 2015	2016 Rate Case Authorized
<b>Sales (1)</b>										
Residential	33,078,163	<b>36,372,453</b>	34,368,169	35,089,857	<b>34,680,991</b>	38,073,912	33,314,651	32,336,729	31,241,987	<b>33,895,608</b>
Commercial	11,659,632	<b>12,659,172</b>	11,538,139	11,328,461	<b>11,261,723</b>	12,264,294	10,770,748	10,767,335	10,575,545	<b>10,740,921</b>
Industrial	7,129,277	<b>8,885,917</b>	7,564,351	8,243,268	<b>7,867,039</b>	7,556,722	7,520,340	7,110,085	7,160,083	<b>7,868,924</b>
<b># of Customers</b>										
Residential	417,772	<b>417,921</b>	417,833	414,939	<b>418,327</b>	419,989	420,438	419,894	420,191	<b>423,246</b>
Commercial	27,116	<b>26,257</b>	25,918	25,394	<b>25,660</b>	25,609	25,595	25,544	25,617	<b>25,949</b>
Industrial	326	<b>320</b>	315	305	<b>302</b>	301	308	308	307	<b>308</b>
<b>Use Per Customer/Per Day</b>										
Residential	216.9	<b>238.44</b>	225.4	231.7	<b>227.13</b>	248.4	217.1	211.0	203.7	<b>219.41</b>
Commercial	1,178.1	<b>1,320.89</b>	1,219.7	1,222.2	<b>1,202.42</b>	1,312.1	1,152.9	1,154.9	1,131.0	<b>1,134.04</b>
Industrial	59,914.9	<b>76,078.06</b>	65,791.3	74,046.9	<b>71,369.31</b>	68,781.9	66,895.0	63,245.7	63,897.9	<b>69,995.77</b>

Note: Includes the impact of weather variations from year to year.

(1) excludes water sales related to new acquisitions not included in rate cases.

- (a) Aqua Missouri Inc., Aqua Development, In., and Aqua/RU, Inc. - 5/16/2011
- Stonebridge Water & Sewer, Inc. - 7/29/2011
- Saddlebrooke Water and Sewer Infrastructure, LLC - 8/5/2012
- Tri-States Utility, Inc. - 8/30/2013
- Emerald Pointe Utility Company - 3/31/2014
- Anna Meadows Homeowners Association, LLC - 12/19/2014
- Redfield Water Company - 4/14/2015

(2) Sales related to new acquisitions not included in rate cases.

		2011	2012 (b)	2013	2014	2015
Consumption:	Residential	53,169	7,054	78,777	118,575	120,256
	Commercial	16,302	430	82,495	148,808	135,472
# Customers	Residential	2,148	86	2,994	3,368	3,542
	Commercial	125	1	380	477	483

(b) Aqua and Stonebridge were included in the 2012 Rate Case therefore sales relating to these districts are included in the 2012 - 2015 Actual Sales.