BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company Application for Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

STAFF RECOMMENDATION

COMES NOW the Public Service Commission Staff ("Staff"), by and through counsel, and recommends that the Commission grant to Missouri-American Water Company ("MAWC" or the "Company") a Certificate of Convenience and Necessity ("CCN") to provide regulated water services in an area of Pettis County, Missouri (Monsees Lake Estates). In support of this *Recommendation*, Staff states as follows:

1. On February 25, 2022, MAWC filed its *Application and Motion for Waiver* ("Application") seeking a Certificate of Convenience and Necessity ("CCN") for authority to install, own, acquire, construct, operate, control, manage, and maintain a water system in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision).

2. On March 1, 2022, the Commission issued its Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation, setting an intervention deadline of March 25, 2022, and ordering Staff to file its recommendation regarding MAWC's Application no later than April 25, 2022. No intervention requests were received.

3. On March 25, 2022, MAWC filed a Motion for *Leave to Amend Application* and Amendment to the Application. The Commission filed an Order Granting Motion to Amend Application on April 8, 2022.

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4. On April 22, 2022, Staff filed a *Motion for Extension of Time to File Staff Recommendation.* The request was granted, and the Commission ordered Staff to file its recommendation no later than June 9, 2022.

5. Pursuant to § 393.170.2, RSMo, no water or sewer corporation shall provide service to consumers without first having obtained approval from the Commission. In determining whether or not to grant such approval, the Commission has traditionally applied the five "Tartan Criteria" established in *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994): (1) there must be a need for the service; (2) the applicant must be qualified to provide the service; (3) the applicant must have the financial ability to provide service; (4) the applicant's proposal must be economically feasible; and (5) the service must promote the public interest.

6. As explained in the Staff *Memorandum*, attached hereto as Appendix A, Staff conducted an investigation into MAWC's request. Based upon its review, Staff concludes that MAWC fulfills the requirements of the Tartan Criteria.

7. Accordingly, Staff recommends approval granting the CCN, with conditions described in the Staff *Memorandum*, as granting the requested CCN would be necessary and convenient for the public service.

8. The Commission need not hold a hearing if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989). No party or individual has requested a hearing, so the Commission need not hold a hearing to grant a CCN to the Company.

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WHEREFORE, Staff respectfully submits this Staff Recommendation for the Commission's information and consideration, and requests the Commission grant Missouri-American Water Company a Certificate of Convenience and Necessity, with conditions, to provide water service to the requested service area.

Respectfully submitted,

<u>/s/ Carolyn H. Kerr</u>

Missouri Bar Number 45718 Senior Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-5397 (Voice) 573-526-6969 (Fax) Carolyn.kerr@psc.mo.gov

Attorney for Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9th day of June, 2022, to all counsel of record.

/s/ Carolyn H. Kerr

MEMORANDUM

Missouri Public Service Commission Official Case File TO: File No. WA-2022-0229 FROM: David A. Spratt – Water and Sewer Department Daronn A. Williams – Water and Sewer Department Amanda C. McMellen – Auditing Department Courtney Horton-Auditing Department Charles Thomason – Customer Experience Department Amanda Coffer – Engineering Analysis /s/David A.Spratt 6/09/2022 /s/Carolyn Kerr 6/09/2022 Staff Counsel/ Case Manager/ Date Date

SUBJECT: Staff's Recommendation to Approve Certificate of Convenience and Necessity

DATE: June 9, 2022

CASE BACKGROUND

On February 25, 2022, Missouri-American Water Company ("MAWC") filed an *Application and Motion for Waiver* ("Application") with the Missouri Public Service Commission ("Commission") to acquire the water and sewer utility assets of Monsees Lake Estates subdivision ("Monsees") in Pettis County near the town of Sedalia, Missouri. The utilities are presently owned and operated by a non-regulated homeowners association ("HOA"). MAWC seeks a Certificate of Convenience and Necessity ("CCN") to provide Monsees with water and sewer service. MAWC's application includes a copy of the HOA ballot and the election results showing that HOA members overwhelmingly approve MAWC's purchase of the systems, a copy of the purchase agreement showing that MAWC proposes to purchase each system for \$1.00, a list of 10 residents within the proposed service area, and MAWC's feasibility study.

On March 1, 2022, the Commission issued its *Order Directing Notice and Setting Intervention Deadline* and directed Staff to file a recommendation no later than April 25, 2022.

On March 25, 2022, in order to address filing requirement 20 CSR 4240-2.080(18), MAWC filed a Motion for *Leave to Amend Application and Amendment to the Application* ("Amendment"). The Commission filed an Order Granting Motion to Amend Application on April 8, 2022.

** Denotes Confidential Information **

On April 22, 2022, Staff filed a *Motion for Extension of Time to File Staff Recommendation*. The request was granted, and the Commission ordered Staff to file its recommendation no later than June 9, 2022.

BACKGROUND OF MAWC

MAWC currently provides water service to approximately 474,000 customers and sewer service to approximately 16,500 customers in service areas throughout Missouri. In recent years, MAWC has acquired many existing small water and sewer systems. MAWC is a subsidiary of American Water Works Company, Inc., and is affiliated with other American Water companies that undertake tasks associated with utility service, such as customer billing and technical resources.

BACKGROUND OF MONSEES LAKE ESTATES

Monsees is a subdivision located in Pettis County, with approximately 60 customer connections who receive both water and sewer service from the HOA. The water system consist of two water producing wells, a 10,000-gallon storage tank, and a 1,000 gallon pressure tank with approximately 5,600 feet of distribution piping. The wastewater system is a two-cell lagoon system with approximately 5,400 feet of gravity collection system.

During Staff's review and investigation, the following discrepancies within the application were noted:

- 1. The water distribution and sewer collection systems were listed as both being approximately 3,000 feet long, but the water distribution system consist of approximately 5,600 feet of total piping and the sewer collection system consist of approximately 5,400 feet of total piping;
- The ground storage tank was listed as a 10,000 gallon tank, but according to Missouri Department of Natural Resources ("DNR") records, it is only a 7,000 gallon tank; and
- 3. The water system was listed as having one well, however, it has two wells.

STAFF'S INVESTIGATION

Water System Background

Per the DNR Permit to Dispense Water ("PTD"), Permit No. MO3036105, Well No. 1 was constructed in 1968 and Well No. 2 was constructed in 1980. Staff has confirmed the following well information from MAWC and the site's PTD.

Well Number	Depth (feet)	Type and Depth of Casing	Pump Capacity (gallons per minute)
Well Number 1	550	Steel casing 6 inch diameter, bottom depth 205 ft.	40
Well Number 2	810	Steel casing 8 inch diameter, bottom depth 332 ft.	175

Water pressure is maintained by a 7,000 gallon hydropneumatic ground storage tank and one 1,000 gallon pressure tank, per the PTD. Per MAWC's response to Data Request ("DR") 0027, the water distribution system was installed in the 1970s and 1980s. This response also states the distribution system is made of galvanized and plastic piping. Based on conversations during the site visit, the plastic is SDR 21 plastic piping. In addition, MAWC stated in response to DR 0027 that the distribution system consists of approximately 4,200 feet of three-inch and approximately 800 feet of two-inch SDR-21 piping. Based on the information from a follow up e-mail on April 12, 2022, with MAWC, the water distribution system also consists of approximately 600 feet of four-inch galvanized piping. The HOA has maintained the water system, but the work appears to be minimal over the last 10 years, according to the list of assets provided by MAWC. The water system is mostly unmetered. Out of the approximately 60 connections, approximately five meters have been installed due to a history of non-payment. These metered customers currently pay the same flat rate as the unmetered customers. The current and proposed water and sewer rates are discussed further in this memorandum.

DNR Inspection of Water System

DNR's last inspection of the water system was on March 3, 2020, resulting in an inspection report dated April 2, 2020. This report states an average of 7,000 gallons per day and a maximum of 14,000 gallons per day is produced by the water system.

The inspection report noted one unsatisfactory finding: the use of caulking where the electrical wiring passes through the wellhead at the larger well. DNR stated that this caulking is only a temporary solution and a permanent solution such as a threaded connection or tight-fitting grommet should be used. In addition, DNR had the following recommendations:

- 1. The vent tubes at each well are not large enough to allow the well to adequately vent. The entire vent installation should be a minimum of 1.5 inches in diameter. Undersized vents lack the capacity to allow the well to vent properly and could allow contamination to be drawn into the well from other openings in the well head. The current vent tube should be enlarged to at least 1.5 inches in diameter the next time regular maintenance is performed on the well.
- 2. The well house does not have adequate heating. If the system has issues with freezing, then system personnel should install some form of heating to prevent damage to the piping and pressure tank.
- 3. Proper equipment for measuring draw down, yield, and static water levels should be installed. DNR recommends draw down, yield, and static water level tests be performed and recorded once every month on the system's wells. Draw down tests provide information regarding potential well maintenance issues and aquifer conditions and characteristics. The tests will alert the system officials to pump problems or a low water level in the well before pump failure occurs or the well's specific capacity changes and leaves the system out of water.
- 4. A DNR-approved wellhead protection program needs to be implemented. A wellhead protection program identifies the area of recharge for each well, identifies existing sources of contamination within these recharge areas, protects recharge areas from new sources of contamination through zoning and land acquisition, plans for problems from existing sources of contamination, and locates new wells in protected areas.
- 5. For the most part, the system does not have individual meters on each service in the distribution system and therefore the HOA is charging a flat rate for water

services. DNR recommends the installation of meters to track water loss for the system. Once meters have been installed, DNR also recommends a leak detection and location program be implemented where applicable.

Per an e-mail, dated May 9, 2022, MAWC informed Staff that the Monsees HOA has not addressed any of DNR's concerns listed in the inspection report. As a result, Staff expects MAWC to address these concerns upon ownership.

According to Drinking Water Watch on DNR's Web site, Monsees failed to submit its Consumer Confidence Report (CCR) in 2021 but has not had any other violation since 2015. The CCR reports provide customers information about the results of the water samples from their well.

Sewer System Background

The Monsees wastewater treatment facility ("WWTF"), which was originally constructed in 1967, consists of a collection system and a two-cell lagoon. Based on MAWC's response to DR 0027, the collection system consists of vitrified clay pipe ("VCP") and plastic piping. The plastic piping is made of polyvinyl chloride ("PVC"). The exact lengths of the VCP and PVC are unknown, but MAWC estimates the collection system has approximately 2,700 feet of six-inch VCP and approximately 2,700 feet of six-inch PVC. In addition, MAWC's response to DR 0027, notes the wastewater collection system was installed in the 1970s and 1980s. The collection system is gravity piping with no force mains or lift stations.

According to the DNR permit (Permit No. MO-0096831), the lagoon, has a design flow of 28,300 gallons per day ("gpd") and an actual flow of 19,500 gpd. The receiving stream for this facility is the tributary to Little Shaver Creek. This facility is not required to have a certified operator nor required to aerate the lagoon cells.

DNR issued the Monsees HOA a Schedule of Compliance ("SOC") when the wastewater permit was renewed February 17, 2017. The SOC contained new effluent limits for ammonia and *E. coli* being discharged from the lagoon. The SOC stated, "The facility shall attain compliance with final effluent limitations for ammonia and *E. coli* as soon as reasonably achievable or no later than 4 years of the effective date of this permit." There were no upgrades made to the lagoon during that time period and no records of DNR receiving any status reports. As a result, the facility

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has consistently exceeded the *E. coli* and ammonia limits. The DNR wastewater permit expired on June 30, 2021. Per MAWC's response to DR 0024, the renewal application for this operating permit was submitted to DNR on January 28, 2022.

DNR Inspection of Sewer System

DNR's last inspection of the wastewater system was on November 13, 2018, which resulted in an inspection report dated December 17, 2018. During this inspection, DNR found one unsatisfactory finding: the failure to maintain the inner berm slopes of the lagoon cells to be less than a three to one (3:1) ratio. The lagoon berms have developed erosion damage from wave erosion, and bank dens and tunnels from muskrats. DNR requires the inner slopes to be no less than 3:1 and outer slopes are to be no less than 4:1. DNR recommends clay soil to be compacted into the damaged areas and then the use of riprap to cover the repaired areas to prevent future damage to the site.

This inspection report also listed several recommendations, which included:

- 1. Monitor sludge levels and consider sludge removal;
- 2. Repair lagoon berm erosion as it is discovered;
- 3. Contact the Missouri Department of Conservation for information about removing animals from the lagoon system;
- 4. Place riprap on the interior of the lagoon cell berms to prevent further erosion issues;
- 5. Ensure that the lagoon has enough retention time for proper treatment of the wastewater;
- 6. Consider installing a device at the outfall to ensure that accurate measurements of flow are taken;
- 7. Ensure that regular mowing is conducted throughout the year as needed around the facility to allow routine inspections of the integrity of the structures; vegetation should be maintained at a height of approximately six inches or less;
- 8. Submit data discharge monitoring reports electronically to DNR; and
- 9. Apply for a construction and operating permit when appropriate.

The Monsees HOA has not taken any action on the above DNR recommendations from its last wastewater inspection. The sludge has not been removed, the lagoon berms are still in disrepair and lack the recommended riprap. Additionally, muskrats seem to still appear to be damaging the lagoon berms, and a flow measuring device has not been installed. It did appear that regular

mowing was conducted around the facility. The HOA is still submitting its data to DNR electronically. Since the HOA has not made any modifications, a construction permit from DNR has not been needed. As stated previously, the HOA's operating permit expired, but a renewal application was submitted to DNR on January 28, 2022.

Staff's Observations of Sewer and Water Systems

Staff inspected the Monsees water and wastewater systems on April 8, 2022. Staff met MAWC employee Matt Barnhart at the wastewater lagoon. It was apparent that the lagoon had experienced wind erosion and damage from animals burrowing. Installing riprap around the lagoon is commonly done to protect the berms by preventing erosion and animal damage. During Staff's site visit, MAWC mentioned it would be willing to add riprap to stabilize the lagoon berms. Sludge was visible in the first cell of the lagoon. MAWC suggested during the site visit that, upon ownership it would aerate the cell and reduce the amount of sludge. The lagoon was secured by a locked fence with the appropriate signage. Staff witnessed a significant amount of effluent discharging at the outfall. The inspection was performed at 9:30 a.m. when the majority of customers are not typically home, which led Staff to believe that the high amount of discharge was due to inflow and infiltration getting into the collecting sever after several days of heavy rain. The effluent was green in color from duckweed being discharged. Because the duckweed was discharging from the second cell there was very little of it to be seen in the second lagoon cell during the inspection.

Next, Staff inspected the well house. The well house is a cinder block building which houses both well heads, a 1,000 gallon pressure tank, and a 7,000 gallon ground storage tank. It did not appear to Staff that the building had been maintained. The wood around the building (siding, fascia, soffit, and doors) and the ceiling showed signs of age and wear. The wooden door had a padlock on it. Staff was able to inspect the smaller well (Well No. 1), the pressure tank, and the ground storage tank. The well house was also used for storage of parts, tools, supplies, and well information. Boil order signs were also found inside the well house to notify customers to boil their water in the event of a low pressure event. Staff was unable to see the wellhead for the larger well (Well No. 2) as MAWC did not have a key for the door to access that part of the building. The water system currently does not use chlorine in the drinking water. During the site visit, MAWC

stated that it would add chlorine disinfection to the drinking water and place a fence around the well house, if granted the CCN for this system. Outside of the well house was a sign board where the water system posted the annual water quality report, permit to dispense water, and emergency contact information.

MAWC's Proposed Capital Investments

In its response to Staff's DR 0025, MAWC listed proposed improvements and a systematic, planned approach to resolve known compliance issues. Per this DR response, MAWC plans to make the following improvements and maintenance actions to the wastewater system:

- 1. Install flow meter and/or effluent flume by 2023;
- 2. Add disinfection (typically by the use of chlorination or ultra-violent light) to meet *E. Coli* limits by 2023; and
- 3. Smoke test sewer mains for leaks by 2025.

During the site visit, MAWC stated it would also repair the lagoon berms and stabilize the lagoon by adding riprap to the berms, possibly add aeration to the first lagoon cell and investigate land applying the sludge to nearby farm fields.

Furthermore, in MAWC's response to Staff's DR 0025, MAWC plans to make the following improvements and maintenance actions to the drinking system:

- 1. Install monitoring, possibly in the form of a Supervisory Control and Data Acquisition system (commonly referred to as SCADA) to alert operators on water tank and disinfection levels by 2023;
- 2. Install security fencing by 2023; and
- 3. Install approximately 10 meters per year until all homes are metered.

During the site visit, MAWC stated it would also add chlorination to disinfect the drinking water.

MAWC will also address DNR recommendations as listed in DNR inspection reports. These improvements are necessary for compliance and would also promote ongoing safe and adequate service.

Rate Base

Normally, the Auditing Department would review plant-in-service records and expense records maintained by the HOA for Monsees' water and sewer systems. However, the

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HOA received the majority of the water and all of the sewer systems from the developer as contributed plant, as noted in the assets section of MAWC's confidential Feasibility Study, included as Appendix F-C and G-C to its Application. The Auditing Department also understands the developer did not provide the HOA with any documentation to support the developer's original cost to install the Monsees water and sewer systems. Also, the HOA did not retain the majority of the plant records to support any additions to the water system. In response to Staff Data Request No. 2, MAWC stated that no books or records were obtained from the HOA, although MAWC provided Staff, through an informal email request, the April 2022 electric bill, a sewer sampling invoice, and the 2016 annual meeting information that discusses repairs and maintenance to the well house. In response to Staff Data Request No. 9, MAWC stated that "no information on the source of the assets was provided by Monsees Lake Estates. MAWC has assumed that all assets installed pre-1972 were part of the original installation by the developer and have been marked as contributed property. All other investment, made by the Association has been treated as rate base."

In preparing its confidential Feasibility Study for this case, MAWC used similar systems it owns, engineering assessments, and due diligence visits to estimate the value of the water and sewer system at today's cost. MAWC then converted those numbers into an estimate of what it cost at the time MAWC believes the plant was originally put in service. MAWC then calculated the depreciation reserve from 1968 to 2021, resulting in a net plant valuation. MAWC determined the net book value of the water system to be **

Staff performed the same calculation using MAWC's estimated plant values, from 1968 to the end of 2021 and MAWC's most current depreciation rates for the water and sewer system. Staff also calculated Contributions in Aid of Construction (CIAC) Amortization over the same time period as the depreciation reserve.

of that date.

The proposed purchase price of \$1.00 for the sewer system assets is above Staff's calculation of net book value of ** ****** as of December 31, 2021. The proposed purchased price of \$1.00 for the water system assets is below Staff's calculation of the net book value of ** ****** as of December 31, 2021.

Staff's estimated rate base is presented for information purposes only. A Commission decision regarding rate base level in this case is not necessary. The determination of the value of any acquisition adjustment will be made in MAWC's next general rate filing if it seeks recovery of capital and expense costs related to this water and sewer system. Staff has traditionally opposed inclusion of positive or negative acquisition adjustments in utility rates. If the Commission approves this CCN, and MAWC acquires the Monsees water and sewer system, then Staff expects an updated rate base level for this system will be established when MAWC files its next rate case. It has been Staff's position in prior cases that the rate base, and ultimately the utility rates charged for acquired properties should be based upon the original net book value of such properties when first devoted to public use; rate base should not reflect the amount of any acquisition adjustment in this matter.

MAWC indicated it was unable to obtain from the HOA any invoices or supporting documentation of original cost and installation for any plant asset of the Monsees Estates water and sewer system, which includes any of the water system additions put into service after 1971 that were paid by the HOA. Therefore, both MAWC's and Staff's calculations are based on estimated values. In order to more accurately establish a rate base for the water and sewer system in the first rate case for which it is included, Staff recommends MAWC attempt to obtain from the Monsees Estates HOA, as best as possible prior to or at closing, all records and documents, including but not limited to all plant-in-service original cost documentation, along with depreciation reserve balances, documentation of CIAC transactions, and any capital recovery transactions.

Pursuant to Commission regulations, MAWC should keep its financial records for all utility capital related costs accounts and operating expenses in accordance with the National Association of Regulatory Utility Commission (NARUC) Uniform System of Accounts. Staff recommends

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the Commission specifically require such recordkeeping apply to the Monsees water and sewer system.

Service Area

In its Application, MAWC requests only the Monsees subdivision boundary, an area containing approximately 331 acres, as an approved service area. The subdivision is substantially developed and additional connections are not anticipated.

An appropriate legal description and map for the requested service area were included in the March 25, 2022 Amendment filing as Attachments C and D, and accompany this Memorandum as Attachments A and B, respectively.

Staff recommends that this proposed service area map and legal description be approved, and that this service area be depicted in MAWC's tariff, as further discussed herein.

Rate and Tariff Matters

According to its Application, MAWC proposes adopting the current water and sewer rates the HOA has been charging its residents of \$35.30 per month for water and \$58.00 per month for sewer, for a total of \$93.30 per month. Staff finds this to be reasonable and in keeping with past Commission actions. Staff will examine rates for this system as part of MAWC's next rate case.

A map and a description of the proposed Monsees service area, similar to that shown on the attachments to this memorandum (A and B), will need to be included as new tariff sheets in MAWC's water tariff, MO P.S.C. No. 13, and sewer tariff, MO PSC No. 26, respectively.

The table of contents in MAWC's tariff will also need to be updated to reflect the addition of the new sheets containing the map and description.

Staff recommends that <u>after approval but before MAWC closes on the utility assets</u>, MAWC submit the new or revised sewer tariff sheets so they may become effective <u>on or before</u> the date MAWC closes on the Monsees assets.

Technical, Managerial, and Financial (TMF) Capacity, and Tartan Energy Criteria

Staff utilizes the concepts of Technical, Managerial, and Financial (TMF) capacities in studying applications involving existing water and/or sewer systems. Staff has reviewed and stated its

position on TMF regarding each of MAWC's affiliates in previous CCN and transfer of assets cases before the Commission. Staff's position on MAWC's ability to meet TMF criteria remains positive regarding those affiliates, and similarly takes the position that MAWC has adequate TMF capacity in this case. It is Staff's position that MAWC has the ability to secure funding, to oversee construction of any necessary upgrades or repairs, and the ability to successfully manage operations of the Monsees utility systems.

When considering a request for a new CCN, the Commission applies criteria originally developed in a CCN case filed by the Tartan Energy Company and referred to now as the "Tartan criteria." The Tartan criteria contemplate 1) the need for service; 2) the utility's qualifications; 3) the utility's financial ability; 4) the economic feasibility of the proposal; and, 5) promotion of the public interest. Similar to the TMF capacities, in previous CCN cases Staff investigated these criteria and that investigation relates to this proposed acquisition. The results of Staff's investigation are outlined below:

(1) Need for Service

The existing customer base in the Monsees HOA has both a desire and need for service. The Monsees subdivision has its own well for water and its own lagoon for sewer. The location of this subdivision is remote and there is not a neighboring system or district with which to connect. The HOA has made the decision to sell the existing water and sewer systems in order to let MAWC maintain and operate them. The sewer system is in need of upgrades to ensure the provision of safe and adequate service. If approved for the CCNs, MAWC plans to invest in the wastewater system in order for the system to meet all proposed DNR effluent limits.

(2) Applicant's Qualifications

MAWC is an existing water and sewer corporation and public utility subject to the jurisdiction of the Commission. MAWC is currently providing water service to approximately 470,000 customers and sewer service to more than 15,000 customers in several service areas throughout Missouri. MAWC is a subsidiary of American Water Works Company, Inc., and is affiliated with other American Water companies that undertake some of the tasks associated with utility service, such as customer billing, and technical resources. MAWC is qualified to operate the Monsees systems.

(3) Applicant's Financial Ability

MAWC anticipates no need for external financing to complete this acquisition, and has demonstrated over many years that it has adequate resources to operate utility systems it owns, to acquire new systems, to undertake construction of new systems and expansions of existing systems, to plan and undertake scheduled capital improvements, and timely respond and resolve emergency issues when such situations arise. MAWC possesses the financial ability to operate the Monsees systems.

(4) Feasibility of the Proposal

MAWC's feasibility study indicates that the purchase of Monsees' assets will generate positive income. MAWC can draw upon the significant resources of its parent company, should any shortfall arise prior to the next rate case. MAWC's proposal is feasible.

(5) Promotion of the Public Interest

Due to involvement by the HOA in voting to approve the sale of the water and sewer systems, and entering into the subsequent Purchase Agreement, and for the reasons outlined previously in this memorandum, Staff asserts that MAWC's request for a CCN and related acquisition of Monsees water and sewer assets promotes the public interest.

Staff takes the position that it is feasible and in the public interest for MAWC to own, operate, and manage the existing water and sewer operations.

Staff's conclusion is that MAWC's application meets the TMF capacities and the Tartan Energy criteria for this case.

Depreciation

In Case No. WR-2020-0344, the Commission ordered water and sewer depreciation rates applicable to all divisions of MAWC. Staff recommends the use of these water and sewer depreciation rates for all accounts associated with Monsees. The current depreciation rates are included in Attachment E.

Publicity and Customer Notice

Prior to the vote for the sale, MAWC held meetings with the homeowners and provided periodic

updates to members of the Monsees HOA and its board. MAWC attended a question-and-answer session prior to the vote of the property owners where it generally explained the acquisition process. An election was held on October 11, 2020, to vote on the "Agreement for Purchase of our Water and Wastewater Systems." The ballot language does not state that the HOA will sell each system for \$1.00, but Staff is satisfied that customers were aware of the purchase price in advance of the vote. According to MAWC, Monsees' bylaws required two-thirds (2/3) consent for the measure to pass.¹ Including all submitted ballots, 76% of the votes were in favor of selling the subdivision's water and sewer system to MAWC. There were 63 total votes cast, of which 48 voted "yes" and 15 voted "no." MAWC and the Monsees HOA entered into an Agreement for Purchase of Water and Wastewater Systems ("Agreement") on November 16, 2020.

To date, no Monsees customers have entered comments into EFIS regarding this transaction.

Customer Experience

The HOA currently does not have an office for customer service. Customers currently contact the HOA by phone, email, through the HOA Facebook page, or by contacting an HOA board member directly. If MAWC acquires the water and sewer systems, customer service will be provided by the same team responsible for the rest of MAWC's customers. Customer Service Representatives will be available for Monsees customers to contact toll-free at 1-866-430-0820 from 7:00 a.m.-7:00 p.m., Monday through Friday, and will be available 24/7 for emergencies. Customers may also communicate with MAWC by email at welcomemoaw@amwater.com or social media via Facebook, LinkedIn, Instagram, Twitter, and YouTube. MAWC proposes to reopen a business office at 1705 Montserrat Park, Warrensburg, MO 64093 to serve Monsees customers as well as other customers in the area. Customers will be able to visit the office from 7:30 a.m.-noon and 12:30-4:00 p.m., Monday through Friday.

Presently, customers are able to pay in person via credit/debit card, check, or cash and online via credit/debit card or check. Checks are also accepted by mail. If MAWC acquires the water and sewer systems, customers will be integrated into the Missouri-American Water system for billing and customer service. MAWC will offer payment options which include check, credit/debit card, and electronic funds transfer (EFT). Customers will also have the option to make

¹ Case No. WA-2022-0229, Application and Motion for Waiver pg. 3, filed February 25, 2022.

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payments online via check or credit/debit card. Customers can also make payments over the phone by calling 855-748-6066.

In order to incorporate the Monsees customers into its billing and customer service systems, it will be necessary for MAWC to properly enter the appropriate customer information into its systems and apply the Commission-approved rate. MAWC will also need to provide training to its call center personnel regarding rates and rules applicable to the Monsees customers so that customer service matters are handled accurately and in a timely manner.

Transaction Fee

In the course of Staff's investigation it was discovered that the sample customer notifications included in Appendix H of the current application, as well as customer notifications that have been sent to other MAWC customers up to the present, contain incorrect information. Specifically, MAWC's informational brochure and discontinuance notice in Appendix H contain references to a \$1.95 transaction fee for credit and debit card transactions. This fee was incorporated into MAWC's overall cost of service as a result of case WR-2020-0344, and should no longer be charged to Missouri customers per transaction. In response to Data Request No. 029 and in communications with Staff, MAWC clarified that it does not currently charge the transaction fee and the inclusion of the fee in the Appendix H brochure was a mistake that would be removed for Monsees and future transactions. Upon further investigation, Staff discovered other locations where references to the transaction fee persist, including on discontinuance notices that are currently being sent to MAWC customers and on MAWC's online customer portal. The transaction fee was also on a .pdf version of the brochure that a customer will find if they follow the Appendix H brochure's instructions to navigate MAWC's website to find the rights and responsibilities of the utility and the customer.² Staff is also aware of an incident during the month of May 2022 where a MAWC call center representative incorrectly told a Missouri customer that a transaction fee would apply if that customer were to pay with a credit or debit card. The representative offered to waive the fee for that month's payment but informed the customer that this was a one-time offer that would not apply to future payments. In addition to correcting the information for this case, Staff will monitor to make sure similar errors do not occur in the future.

² See Appendix H, page 19.

Communication of Customer Rights and Responsibilities

In addition to the above concerns, Staff has determined that MAWC's standard distributed communications to new customers are not in compliance with prior Commission Orders and Commission Rule 20 CSR 4240-13.040(3). Prior Commission Orders in acquisition cases typically incorporate a set of recommendations from the Staff memo. One of these recommendations, standard in most acquisition cases, states the following:

MAWC shall distribute to the City customers an informational brochure detailing the rights and responsibilities of the utility and its customers regarding its sewer service, consistent with the requirements of Commission Rule 20 CSR 4240-13.040(3), within thirty (30) days of closing on the assets;³

Staff reviewed the customer communications in the last four acquisition cases. Currently, MAWC's communications to new customers consists of a brochure, a welcome letter, a handout for understanding the MAWC bill, a handout about cross connections, and two separate pages of customer rights and responsibilities.⁴ The brochure itself does not contain any references to rights and responsibilities.

Furthermore, 20 CSR 4240-13.040(3) states in part that:

A utility shall prepare, in written form, information in plain language, which summarizes the rights and responsibilities of the utility and its customers in accordance with this chapter...The information shall be delivered or mailed to each new customer of the utility upon the commencement of service and shall be available at all times upon request.

The provision also contains a list of topics that the required summary of rights and responsibilities must address.

In examining the totality of MAWC's communications with new customers, Staff has overall concerns about the Company's compliance with 20 CSR 4240-13.040(3). When MAWC acquires new customers, it distributes two pages of information that mostly provide a detailed explanation of the rights and responsibilities of the utility and the customer. However, these pages do not satisfy

³ Taken from WA-2022-0049, Order Approving Transfer of Assets and Granting Certificate of Convenience and Necessity, page 6.

⁴ See CXD Schedule (Example New Customer Welcome Packet)

20 CSR 4240-13.040(3)(B), (D), and (G) because they do not include information on methods for customer verification of billing accuracy, deposit and guarantee requirements, or an explanation of meter reading procedures that would enable a customer to read his/her own meter.

MAWC's website does contain a document that has a more complete list of customer rights and responsibilities, should a customer desire to look them up. This document addresses most of the requirements of 20 CSR 4240-13.040(3) and includes some parts of the rule that the new customer information omits. However, the document does not satisfy parts (B) and (D) of the rule because it does not include information on methods for customer verification of billing accuracy or deposit and guarantee requirements.

Staff has been in communication with MAWC regarding these issues, and MAWC has been responsive to amending its materials both online and in its written materials to comply with 20 CSR 4240-13.040(3) and reflect accurate information. At present, MAWC has updated the brochure available to customers on its website, and has sent Staff a preliminary version of the revised rights and responsibilities. It is also in the process of updating its disconnection notices as well as page 1 of its customer bill to remove the transaction fee language. In some cases, namely the online customer portal and page 2 of the customer bill, MAWC stated that the template is standard for all American Water customers and as such cannot be changed.

OTHER ISSUES

The HOA, is an unregulated water and sewer operation, which has no obligations to the Commission, and has no pending actions before the Commission.

MAWC is a corporation that is in "good standing" with the Missouri Secretary of State.

MAWC is current with annual report filings with the Commission through calendar year 2020, as documented on the Commission's Electronic Filing and Information System (EFIS).

MAWC is current on its annual assessment quarterly payments through the third quarter of fiscal year 2022.

MAWC has no cases pending before the Commission which will impact the outcome of this application.

STAFF'S RECOMMENDATIONS AND CONCLUSIONS

Staff's position, based on its review as described herein, is that the proposal for a new CCN to provide sewer service and apply existing MAWC rates is in the public interest. Staff therefore recommends approval with the conditions and actions as outlined herein.

STAFF'S RECOMMENDATIONS

Based upon the above, Staff recommends that the Commission:

- 1. Grant MAWC a CCN to provide water and sewer service in the proposed Monsees service area, as outlined herein;
- 2. Allow the Company to adopt the current water rate of the HOA at \$38.30;
- 3. Allow the Company to adopt the current sewer rate of the HOA at \$58.00;
- Require MAWC to submit tariff sheets, to become effective before closing on the assets, to include a service area map, service area written description, rates and charges to be included in its EFIS tariffs P.S.C. MO No. 13 and 26, applicable to water and sewer service, respectively;
- 5. Require MAWC to notify the Commission of closing on the assets within five (5) business days after such closing;
- 6. If closing on the water and sewer system assets does not take place within thirty (30) business days following the effective date of the Commission's order approving such, require MAWC to submit a status report within five (5) business days after this thirty (30) business day period regarding the status of closing, and additional status reports within five (5) business days after each additional thirty (30) business day period, until closing takes place, or until MAWC determines that the transfer of the assets will not occur;
- 7. If MAWC determines that a transfer of the assets will not occur, require MAWC to notify the Commission of such no later than the date of the next status report, as addressed above, after such determination is made, and require MAWC to submit tariff sheets as appropriate and necessary that would cancel service area maps, descriptions, rates and rules applicable to the Monsees service area in its sewer tariff;

- Require MAWC to keep its financial books and records for all utility capital related costs accounts and operating expenses in accordance with the NARUC Uniform System of Accounts;
- Utilize the depreciation rates ordered for MAWC in Case No. WR-2020-0344 for the Monsees assets;
- 10. Make no finding that would preclude the Commission from considering the ratemaking treatment to be afforded any matters pertaining to the granting of the CCN to MAWC, including expenditures related to the certificated service area, in any later proceeding;
- 11. Require MAWC to provide training to its call center personnel regarding rates and rules applicable to the Monsees customers, and require MAWC to provide training to its call center personnel regarding MAWC's transaction fee procedures established after case WR-2020-0344;
- 12. Require MAWC to update all of its future communications with Missouri customers, particularly but not exclusively its overdue/discontinuance notices, informational brochures, and website, to accurately reflect MAWC's current policies regarding debit/credit card transaction fees, within ten (10) business days after closing on the assets;
- Require MAWC to revise its informational brochure to bring it into full compliance with Commission Rule 20 CSR 4240-13.040(3) within ten (10) business days after closing on the assets;
- 14. Require MAWC to inform its customers by using a bill message that the customer rights and responsibilities section of its website has been updated, and that customers may call in to request an updated brochure, for three (3) monthly billing statements after the updates are completed, and to send a sample bill for each month to CXD Staff;
- 15. Require MAWC to include the Monsees customers in its established monthly reporting to the CXD Staff on customer service and billing issues, on an ongoing basis, after closing on the assets;
- 16. Require MAWC to distribute to the Monsees customers an informational brochure detailing the rights and responsibilities of the utility and its customers

regarding its water and sewer service, consistent with the requirements of Commission Rule 20 CSR 4240-13.040(3), within thirty (30) business days of closing on the assets;

- 17. Require MAWC to provide to the CXD Staff an example of its actual communication with the Monsees customers regarding its acquisition and operations of the water and sewer system assets, and how customers may reach MAWC, within ten (10) business days after closing on the assets;
- Require MAWC to file a notification in this case in EFIS when it opens its business office at 1705 Montserrat Park, Warrensburg, MO 64093;
- 19. Require MAWC to provide to the CXD Staff a sample of ten (10) billing statements from the first month's billing within thirty (30) business days after closing on the assets; and
- 20. Require MAWC to file notice in this case outlining completion of the above-recommended training, customer communications, and notifications within ten (10) business days after such communications and notifications.

Staff will submit a further recommendation regarding tariff sheets after filing by MAWC in this matter.

Attachments:

- A: Proposed Sewer Service Area Map
- B: Proposed Sewer Service Area Description
- C: Asset Valuation [Confidential]
- D: Example New Customer Welcome Packet
- E: Current Depreciation Rates

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF AMANDA COFFER

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW Amanda Coffer, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Amanda Coffer

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this $\underline{944}$ day of June, 2022.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070

Suzellankin

Notary Public

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF COURTNEY HORTON

STATE OF MISSOURI)) ss. COUNTY OF COLE)

COMES NOW Courtney Horton, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Courtney Horton

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 2^{+} day of June, 2022.

Diania L. Vaug 4 Notary Public ()

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2023 Commission Number: 15207377

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF AMANDA C. MCMELLEN

STATE OF MISSOURI)) SS. COUNTY OF COLE)

COMES NOW Amanda C. McMellen, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Staff Recommendation; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

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JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 9th day of June, 2022.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070

<u>Notary Public</u>

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF DAVID A. SPRATT

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW David A. Spratt, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Staff Recommendation; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

David A. Spratt

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 9+4 day of June, 2022.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070

Suzullankin Notary Public

OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage ānd Māintain a Watēr System and Sēwer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF CHARLES THOMASON

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)

STATE OF MISSOURI)) ss. COUNTY OF COLE)

COMES NOW Charles Thomason, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Thomason

Charles Thomason

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 2+2 day of June, 2022.

DIANNA L. VAUGHT	
Notary Public - Notary Seal	
State of MISSOU()	
Commissioned for Cole County	
My Commission Expires: July 18, 2023 Commission Number: 15207377	
Commission Number: 1520/377	

Dianne L. Vaure Notary Public

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water System and Sewer System in an area of Pettis County, Missouri (Monsees Lake Estates Subdivision)

File No. WA-2022-0229

AFFIDAVIT OF DARONN A. WILLIAMS

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW Daronn A. Williams, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Staff Recommendation; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.

Daronn A. Williams

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 94h day of June, 2022.

Musullankin Notary Public

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070



APPENDIX A

Legal Description

A tract of land in part of Section 4 Township 45 North, Range 20 West, Pettis County, Missouri and being more particularly described as follows:

Beginning at the Southwest corner of the Southeast Quarter of Section 4, being also at the intersection of the North-South Center line with the south line of said section 4; thence North, along said North-South line to the North line of said Section 4 being also the Northwest corner of the Northeast Quarter of said Section 4; thence East, along the North line of said Quarter Section to the Northeast corner thereof, being also being the Northwest Corner of Section 3; thence South, along the East line of said Section 4 to the Southeast corner thereof, being also the Southeast corner of the Southeast Quarter of said Section 4; thence West, along the South line of said Quarter-Section to the Southwest corner thereof and the Point of Beginning. Containing 331 acres, more or less.

ATTACHMENT C

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY



February 15, 2022

Dear Orrick Customer:

Welcome to the Missouri American Water family! We are thrilled to have you as a customer.

The transfer of your water and wastewater service account is being completed. There are no additional steps you need to take for your service to continue. Billing information is being transferred to our system. Your first bill from Missouri American Water is scheduled for the week of March 18. As a new customer we understand you will have questions. In addition to our customer service number listed below, you may also email to **welcomemoaw@amwater.com**. You will be contacted within 24 business hours.

Below are helpful tips as we transition to being your water and wastewater service provider. This information can also be found on our website at **missouriamwater.com > Customer Service & Billing**.

CUSTOMER SERVICE AT YOUR FINGERTIPS

As a customer of Missouri American Water, you have access to a self-service webpage called MyWater, allowing you to manage your account and get emergency updates any time, day or night. With MyWater, you can pay your bill, turn water and wastewater service on and off, and track water usage history. When emergencies do occur, be sure you have access to the most up-to-date information by also signing up for alerts.

Signing up for MyWater is easy, free and simple! Visit **missouriamwater.com** and click on "Sign Up" in the "Login to MyWater" box in the top right corner. Make sure you have your Missouri American Water account number handy, which is listed on the top corner of your bill.

MyWater provides you with 24/7 payment ability. With MyWater, you can view and pay your bill, manage your account, set up paperless billing, and enroll in autopay. Payments can also be made by phone or via mail. You can also pay by cash, check, or credit card. To learn more about these options, please visit **missouriamwater.com**. You can also contact customer service at **1-866-430-0820**.

YOUR SERVICE

Missouri American Water operates under regulations established by the Missouri Public Service Commission (MoPSC). If you believe we have not responded to an issue in a satisfactory manner, you have the right to request that the MoPSC review the unresolved issue. You may contact them at:

Missouri Public Service Commission Governor Office Building 200 Madison St, PO Box 360 Jefferson City, MO 65102-0360 800-392-4211 or psc.mo.gov

Included in this packet you will find a copy of our welcome booklet, our bill redesign fact sheet and our rights and responsibilities outline, which provides specific information about our policies regarding your water and wastewater service with us. It defines your rights and responsibilities and provides information about your bill, how to pay your bill and who to contact for questions regarding your service.

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WE KEEP LIFE FLOWING[®]

Missouri American Water 3524 S Leonard Rd St. Joseph, MO 64503 P 1-866-430-0820 missouriamwater.com

Our team of dedicated professionals is committed to providing exceptional wastewater and customer service. From customer service representatives to plant operators, our employees recognize the critical role they play in meeting your daily service needs. You will notice our employees are easily recognizable as they wear uniforms and carry company identification.

As a subsidiary of American Water, we have been providing reliable water and wastewater services for more than 140 years. We are a proud community partner, dedicated to making your customer experience a pleasant one. We look forward to serving your community.

Sincerely,

by Larlow

Jody Carlson Senior Manager Operations Missouri American Water

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Missouri American Water 3524 S Leonard Rd St. Joseph, MO 64503 P 1-866-430-0820 miss

Attachment D Page 3 of 21 Your rights and responsibilities as a customer of Missouri American Water

If You Have a Question or Complaint

Missouri American Water customer service representatives are dedicated to handling every customer inquiry with attention and care. Our goal is to answer your question or resolve your issue quickly and effectively. We encourage customers to call us at 866-430-0820 as soon as an issue arises.

Bill Payment/Discontinuance of Service

Bill payments are due 21 days after the billing date. The due date is printed on the front of the bill. A delinquent charge may be applied to all accounts not paid in full by the due date. Bills become delinquent after the due date stated on the bill. If the bill is not paid, service may be disconnected.

We will mail a written notice at least 10 days before we discontinue service for water customers (including customers that are both water and wastewater customers of Missouri American Water), and at least 30 days before we discontinue service for wastewater-only customers. The notice explains the reason for the discontinuance of service and the amount of money owed in the case of a past due bill. For wastewater customers, the 30-day notice may be waived if there is any waste discharge that might be detrimental to the health and safety of the public or cause damage to the wastewater system.

If you receive a notice, please take immediate action to avoid service discontinuance. Call our Customer Service Center at 866-430-0820.

We will restore service when the bill has been paid or the conditions that caused the disconnection have been corrected. There is a reconnection fee. If you will be absent from your home or business for a period of time, you may avoid discontinuance of service by:

- 1. Forwarding your mail to an address where your bill will reach you.
- 2. Signing up for automatic payment.
- 3. Requesting termination of your service.

If you have a question about your bill that we cannot resolve to your satisfaction, you may pay the bill in full and Missouri American Water will credit any overpayment if the matter is resolved in your favor. If you do not pay the bill in full, Missouri American Water and the Missouri Public Service Commission (MoPSC) have complaint procedures in place that are available to customers to resolve disputes and avoid service discontinuance.

- 1. Customers must register a complaint by phone or in writing at least 24 hours before the date stated in the notice of discontinuance.
- 2. Within four days after registering the complaint, the customer must pay the part of the bill not in dispute. If the company and the customer cannot agree on the undisputed amount, at the company's discretion, it may be set at 50 percent of the disputed bill or at the amount of the customer's bill during the same time a year ago.
- 3. Missouri American Water will thoroughly investigate the complaint and attempt to resolve the problem. If, at the conclusion, the customer is still dissatisfied, we will mail a written notice explaining the MoPSC's informal complaint process. Informal complaints must be made to the MoPSC within five days after the date of the notice to avoid service disconnection. Informal complaints can be made by phone at 800-392-4211 or through the MoPSC's website at psc.mo.gov.
- 4. The MoPSC staff will investigate the informal complaint and issue findings. Missouri American Water or the customer may elect to file a formal complaint following the issuance of the finding.
- A formal customer complaint must be filed within 30 days of the MoPSC findings to avoid disconnection. Formal complaints must follow specific rules set out in the MoPSC's Rules of Practice and Procedures, which is available on the MoPSC website at psc.mo.gov.

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WE KEEP LIFE FLOWING®

Missouri American Water P 1-866-430-0820 3524 S Leonard Rd St. Joseph, M0 64503

missouriamwater.com

Missouri American Water operates under regulations established by the Missouri Public Service Commission. If you feel we have not responded to your issue in a satisfactory manner, you have the right to request that the MoPSC review the unresolved issue. You may contact the MoPSC at:

Missouri Public Service Commission Governor Office Building 200 Madison Street, P0 Box 360 Jefferson City, M0 65102-0360 800-392-4211 psc.mo.gov

The Office of Public Counsel (OPC) provides an additional resource for Missouri utility customers. The OPC represents the interests of the public and utility customers in proceedings before the Missouri Public Service Commission and in appeals in the courts. You may contact the OPC at:

Office of Public Counsel Governor Office Building 200 Madison Street, PO Box 2230 Jefferson City, MO 65102-2230 866-922-2959 opc.mo.gov

From time to time, Missouri American Water's policies may change, so please visit our website at **missouriamwater.com** for the latest information.

WE KEEP LIFE FLOWING®

Missouri American Water 3524 S Leonard Rd St. Joseph, MO 64503 P 1-866-430-0820 missou
WELCOME NEW CUSTOMERS

AMERICAN WATE



MISSOURI American Water

WE KEEP LIFE FLOWING[®]



Attachment D Page 6 of 21

WELCOME TO MISSOURI AMERICAN WATER! We look forward to serving you. Inside this booklet, you will find information on the following:

- Water and wastewater service
- System investment
- Emergency notifications
- Saving water and money
- Customer service
- Payment options
- Payment assistance program

For additional information, visit our website at **missouriamwater.com**.

Attachment D Page 7 of 21



RICHARD SVINDLAND President

A Message from Missouri American Water President RICHARD SVINDLAND

Dear Customer,

Welcome to Missouri American Water. We are proud to be your water and/or wastewater service provider. Our team of experts delivers high-quality drinking water to nearly one in four Missourians, and we also treat wastewater for thousands of homes and businesses to protect the environment. We're dedicated to providing our customers and communities with safe, clean, reliable and affordable water and wastewater service.

This guide will answer questions you may have about our company and the services we offer. We hope you will review its contents and keep it for future reference. If you have questions about Missouri American Water, please call our Customer Service Center at 866-430-0820.

Sincerely,

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RICHARD SVINDLAND President

Attachment D Page 8 of 21

PROVIDING YOU WITH HIGH-QUALITY WATER

Nothing is more important than the safety and quality of our water. We work closely with the U.S. Environmental Protection Agency and the Missouri Department of Natural Resources to provide water that consistently meets or surpasses federal and state standards. To do this, we closely monitor our treatment process by performing more than 500,000 tests each year.

Our commitment to exceptional water quality is recognized in Missouri and across the country.

Our parent company American Water has received more than 150 awards for superior water quality. All six of Missouri American Water's surface water treatment plants are recognized by the Partnership for Safe Water, an honor achieved by less than 1% of all water utilities.



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We only have one environment, so we provide communities with scientifically proven solutions for the safe collection, treatment, and release of wastewater.

Below are a few examples of technology we implement:

- **Membrane Bioreactors:** A powerful and efficient solution for the treatment of wastewater.
- **Biological Nutrient Removal:** The removal of nutrients through an activated sludge system.
- **UV Disinfection:** Replacing chlorine with more environmentally friendly technologies for a safer, more efficient way to treat the water making it safe enough to return to the environment.

INVESTMENT YOU CAN COUNT ON



We continuously monitor, maintain and upgrade our facilities so they operate efficiently and **meet all regulatory standards.** This requires investing in our treatment plants, tanks, pump stations, fire hydrants and metering equipment.



Statewide, we invest more than \$200 million per year in water and wastewater system improvements. Our ongoing commitment to investing in and updating our plants, pumps and pipelines helps provide safe, clean, and reliable service.



Missouri American Water uses a high-speed mass notification system to keep customers informed about water-emergencies and planned temporary service interruptions.

Make sure we can reach you by updating your contact information today through **MyWater** at **amwater.com/mywater** or by calling us at **866-430-0820**.

CONVENIENT CUSTOMER SERVICE

We know you're busy, so we've made it easier than ever to manage your account online through MyWater:

Attachment D Page 12 of 21

- Turn water service on and off
- Track water use
- Sign up for emergency alerts
- Manage your account
- View and pay your bill
- Set up paperless billing

Sign up today by visiting **missouriamwater.com**. You can also contact us at **866-430-0820** to speak with a U.S.-based customer service representative. Call anytime for a water emergency or 7 a.m. – 7 p.m. for non-emergency issues.



Missouri American Water offers a number of payment options to fit into your busy lifestyle.

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AUTOMATIC PAYMENTS: Pay your bill on time, every time. Each month, payments will be automatically deducted from your checking or savings account on the due date.



PAY ONLINE: Visit **amwater.com/billpay**. Be sure to have your 16-digit account number handy.



PAY BY PHONE: Call **855-748-6066** and use your Visa or MasterCard.



PAY BY MAIL: Send your payment and payment stub in the envelope provided. No cash, staples or paper clips.



PAY IN PERSON: Visit our website to find a location near you. Locations DO NOT accept payments by mail.



Sometimes customers face circumstances that stretch their financial resources. Missouri American Water is here to assist. Our customer service representatives will work with you on a plan to pay the balance of your bill over time. You may also be qualified to receive emergency assistance through our H2O Help to Others Program[™], which is supported by voluntary donations from our customers and the company.

For more information about payment assistance options, contact our Customer Service Center at **866-430-0820** or visit us online at **missouriamwater.com > Customer Service & Billing > Payment Assistance Program**.



Our customer service representatives are dedicated to handling every customer inquiry with attention and care.



866-430-0820

Hours: 7 a.m.–7 p.m. For emergencies, we're available 24/7.



infomo@amwater.com



missouriamwater.com



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Attachment D Page 16 of 21



727 Craig Road St. Louis, MO 63141

Printed on paper containing recycled fiber. Please recycle.

Attachment D Page 17 of 21

MAKING IT EASY TO UNDERSTAND YOUR NEW BILL

SIMPLE BILLING. ONE MORE WAY WE KEEP LIFE FLOWING.

How do we know what our customers care about most? We asked. We surveyed 1,000 American Water customers to learn what they liked, didn't like and felt was most important. Your feedback helped us streamline your bill, so it's simpler and easier to understand. Here's what you'll find:



Attachment D Page 18 of 21

Messages from Missouri American Water

Effective 10/7/21, the Infrastructure System Replacement Surcharge (ISRS) per 1.000 gallons is \$0.2358 for Rate A (residential & commercial), \$00/073 for Rate B (sale for resale), and \$0.052 for Rate J (large industrial). The ISRS funds completed water main replacements and related improvements for customers served by our \$1. Louis County operations. ISRS is implemented pursuant to Sections 333.1000, 333.1003, 333.1006. RSMe; 20 CSR 4240-2.060(1); and 20 CSR 4240-3.650. Additional information is available on our website at www.missouriamwater.com

CUSTOMER SERVICE

HOURS: M-F, 7am-7pm • Emergencies: 24/7 TTY/TDD FOR THE HEARING IMPAIRED: 711 (and then reference Customer Service

Go Paperless: Save time. Save money. Sign up for Paperless Billing and Auto Pay on My Account at amwater.com/myaccount. Not registered? Log in and be sure to have your account number handy.

Water Quality: We take water quality seriously. When it comes to complying with federal drinking water standards, we consistently score better than the industry average. For a copy of the annual water quality report for your area, visit missourianwater.com. Under Water Quality, select Water Quality Reports.

1-866-430-0820

SERVICES

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INFO AND EDUCATION

Get useful tips on saving time. saving energy and staying safe throughout the seasons.



EXPLANATION OF OTHER TERMS

- Payment by Check: Paying by check authorizes American Water to send the information from your check electronically to your bank for payment. The transaction will appear on your bank statement. The physical check will not be presented to your financial institution or physical check i returned to you.
- Estimated Bill: This occurs when we are unable to read the water meter. Your usage from the same billing period the prior year is used to calculate the estimated bill. The next actual meter reading corrects any over or under estimates.
- Disputes: If you have questions or complaints about your bill, please call us at 1-866-430-0820 before the due date. If your bill is unusably high, it may indicate that there is a leak in your plumbing. For tips on how to detect leaks and use water wisely, usit us online. You'il find helpful tools under the Water Information menu. Every drop counts! 1
- Rates: A detailed listing of charges that make up your bill is available upon request by contacting Customer Service or visiting us online at missouriamwater.com. Under Customer Service & Billing, select Your Water and Sewer Rates. s
- Correspondence: Please send written correspondence to PO Box 578, Alton, IL 62002-0578. Be sure to include your name, account number, service address, maling address and phone number including area code. Please do not send correspondence with your payment, as it may delay processing your payment and correspondence.

H2O HELP TO OTHERS PROGRAM - lend a h I'm adding a one time contribution of \$ _ with my payment. I'd like to add a recurring contribution to each bill of \$_____ . I understand this amount will be added to each bill. Address Change(s) Other ways to pay your bill 🔷

		🔽 Auto Pa
Name		Save time and mone
Address		Enroll in Auto Pay, an your bill will be paid of
City		time, every time, directly from your bank account on the
State	Zip Code	due date. No
() Phone Number	Mobile Number	stamps required!
E-mail Address		

🕴 In Person Pay 🔲 Online With My Account, you can pay your bil anytime, fast and easy. Visit www.amwater.com/bilgay (fee www.amwater.com/bilgay (fee find one near you. With My Account, you can pay your bill anytime, anywhere. Registration is fast and easy. Visit www.amwater.com/MyAcco

MISSOURI AMERICAN WATER WE KEEP LIFE FLOWIN

Meter Reading and Usage Summary

Measure Size From Date To Date Previous Read Current Read Meter No Meter Units 5/8" 12/29/2021 01/28/2022 1,548 (A) 1 Billing Unit = 100 gallons 26986264 100 gal 1,588 (A) A = Actual E = Estimate

Billed Usage History (graph shown in 100 gallons) 4,000 gallons = usage for this period

Account Detail

Prior Billing

Balance Forward

Water Service Charge Water Usage Charge WSIRA Surcharge

S Pass Through Charges

Water Primacy Fee 12/29/21 to 01/28/22

Total Amount Due

City Sales Tax

Contraction Taxes

Wastewater Service Charge

Total Service Related Charges

Total Current Period Charges

Wastewater Service

Water Service

Payments

2021 2022 220 176 132 Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb

rvice To: 123 WATER WAY ORRICK, MO 64077-0001

Service Related Charges - 12/29/21 to 01/28/22

(40 x \$0.62469) (40 x \$0.02358)

(1 x \$0.44)

Account No. 1017-20000000001

0.00

0.00

0.00

34.93

9.00 24.99 0.94

44.03

44.03

78.96

0.44

0.44

0.79

0.79

80.19

\$80.19



Billing Units

40.00

Total Gallons

Total Gallons

4 000

4 000

Year to Date Billed Usage: 8,000 gallons

Understanding Your Bill

The information below defines some of the new terms you may find on your bill:

- Service Related Charges: This section includes charges for services related to water, wastewater and fire protection If applicable, credits and debits for correction to previously billed charges are itemized in this section.
- Fees and Adjustments: This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
- Pass Through Charges: Charges in this section, when applicable, are separated from other service related charges to provide visibility into what portion of your bill is being remitted to other entities. Payment received for these charges does not remain with American Water. While we may bill and collect for them, the payments received are passed along to other companies and agencies. •
- Billing Units: One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand
- Average Daily Use: The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- Still have questions? We are here to help. Our customer service representatives are available M–F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

For more information about your charges and rates, please visit:



Every penny of your bill is accounted for here.



WE KEEP LIFE FLOWING[®]

H,O Help To Others: H_QO Help to Others is an emergency assistance program created by Missouri American Water and Missouri's Community Action Agencies. The program helps provide supplemental funding to Missouri American Water customers who would otherwise have touble paying their bills. H_QO Help to Others is supported by contributions from Missouri American Water and voluntary contributions from customers.

OTHER WAYS TO PAY

40

INTEGRATED MATERIAL

down on paper clutter.

Helps you stay informed while cutting

Don't want to mail a check? Here's how to pay by phone, online or with Auto Pay.

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PROTECTING YOUR DRINKING WATER

missouri American Water

WE KEEP LIFE FLOWING*

TAKE OUR SURVEY

You can help us determine if a current or potential cross connection exists.

Complete our survey online at: https://forms.office.com/r/ ev07RvchV6

Or mail your completed survey (on the reverse) to: MISSOURI AMERICAN WATER Attn: Cross Connection Department 901 Hog Hollow Rd Chesterfield, MO 63017

Or email your completed survey to: moaw.crossconnection@amwater.com

Survey data helps us identify where backflow prevention devices may be needed and provides information on existing devices. If your response indicates an actual or potential cross connection, we'll contact you with steps to take to eliminate the hazard and protect yourself and the public.

QUESTIONS?

Please contact Missouri American Water's Cross Connection Department at 1-866-554-2912.

You can also find information at missouriamwater.com > Water Quality> Cross Connection & Backflow Prevention.

PROTECTING OUR DRINKING WATER SUPPLY IS EVERYONE'S RESPONSIBILITY!

To help protect the public water supply, Missouri American Water implements a cross connection control program as required by the Missouri Department of Natural Resources (MDNR).

WHAT IS A CROSS CONNECTION?

A cross connection is a physical connection between a possible source of contamination and the public drinking water system piping. This connection, if not properly protected, can lead to the contamination of the drinking water system through a backflow event – or when the flow of water is reversed.

Follow these tips to help protect our water supply:

- Have your backflow device tested by an MDNR certified tester.
- Be aware of, eliminate and/or isolate cross connections.
- Maintain air gaps on sinks.
- Do not submerge hoses or place them where they could become submerged.
- Use hose bib vacuum breakers on fixtures (hose connections in the basement, laundry room, and on outside faucets/spigots).
- Install approved backflow prevention devices on lawn irrigation and fire sprinkler systems.
- Do not create a connection between an auxiliary water system (well, cistern, body of water) and the water supply plumbing.

CUSTOMER RESPONSIBILITY

It is the customer's responsibility to ensure that unprotected cross connections are not created. Required backflow prevention devices must be tested to ensure they meet state requirements and must be maintained in operable condition.

CROSS CONNECTION SURVEY

Save a stamp! Complete the survey online in one of two ways:

Scan the QR code:



Go to https://forms.office.com/r/ev07RvchV6

Alternatively, mail your completed survey to:

Attachment D

MISSOURI AMERICAN WATER Attn: Cross Connection Department 901 Hog Hollow Rd Chesterfield, MO 63017

Or email your completed survey to: moaw.crossconnection@amwater.com

MAILING ADDRESS

Name:	
Business:	
Address:	
City/State/Zip:	

Please check the box that best describes your facility type:

Private Residence

Automotive Maintenance

- Medical/Dental Clinic
- П Mortuary
- Agricultural
 - **Treatment Facility**
 - Veterinary Clinic
 - Apartment with Units
- Hospital Manufacturing

Car Wash

Educational

Food Service

Other

Please check the box or boxes that best describe your fire protection at your facility:

None

- This account serves private hydrants only (no fire sprinkler system in facility)
- This account serves an installed fire sprinkler system
- П Fire sprinkler system has outside fire department connections for pumping into the system
- Fire sprinkler system contains antifreeze or other chemicals
- Fire sprinkler system is also supplied by an auxiliary source of water (i.e., pond, reservoir, or storage tank)

If backflow prevention devices are installed on your plumbing, fire protection or lawn irrigation, they are required by the Missouri Department of Natural Resources to be inspected annually and copies of the test reports be maintained on file with the water company. If current copies of the test reports are not on file with us, please attach copies of the test(s) to this survey.

PROPERTY LOCATION

Address:
City/State/Zip:
Telephone #:
Email:

Please check the box or boxes that best describe the usage of water in your facility:

- П Typical, such as bathrooms, drinking fountains, outside water faucets; household laundry or dishwashing appliances
- Private well(s) supplying any part of your facility
- Connected into a manufacturing process
- П Connected into a chemical process or photo processing
- Connected into underground lawn sprinkler/irrigation system
- Connected into a swimming pool
- П Connected into water-operated/cooled equipment/appliances/ boilers

If you have a backflow device installed on your plumbing, existing device information is needed. Please complete below and provide a copy of the most recent backflow test report(s). (If no backflow device is installed on your plumbing, please skip this section.)

Please circle device type:	RP	RPDA	DC	DCDA	
Manufacturer:		Model:			
Serial #		Size:			
On line to:		ation:			
Please circle device type:	RP	RPDA	DC	DCDA	
Manufacturer:		Model:			
Serial #		Size:			
On line to:		ation:			
Please circle device type:	RP	RPDA	DC	DCDA	
Manufacturer:		Model:			_
Serial #		Size:			

Location:

Signature of individual completing the survey

On line to:





3524 S Leonard Rd St. Joseph, MO 64503

SERVICE. ONE MORE WAY WE KEEP LIFE FLOWING.

MISSOURI AMERICAN WATER COMPANY – Water

Schedule of Depreciation Rates

WR-2020-0344

USOA Account	Account Description	Remaining Life Depreciation	Average Service Life	lowa	% Net
Number		Rate %	(Years)	Curves	Salvage
	Source of Supply		. ,		
311.0	Structures & Improvements	1.97%	60	R4	-25%
312.0	Collecting & Impoundment Reservoirs	0.35%	85	R3	0%
313.0	Lake, River & Other Intakes	3.57%	70	S0.5	-10%
314.0	Wells & Springs	2.52%	55	R1.5	-5%
315.0	Infiltration Galleries and Tunnels	1.77%	60	R2.5	0%
316.0	Supply Mains	1.45%	80	R3	-25%
317.0	Miscellaneous Source of Supply – Other	4.97%	25	SQ	0%
	Pumping Plant				
321.0	Structures & Improvements	3.95%	75	R2.5	-15%
322.0	Boiler Plant Equipment	3.05%	37	R3	-5%
323.0	Power Generation Equipment	3.05%	37	R3	-5%
324.0	Steam Pumping Equipment	1.89%	47	R1	-10%
325.0	Electric Pumping Equipment	1.89%	47	R1	-10%
326.0	Diesel Pumping Equipment	1.89%	47	R1	-10%
327.0	Hydraulic Pumping Equipment	1.89%	47	R1	-10%
328.0	Other Pumping Equipment	1.89%	47	R1	-10%
520.0	Water Treatment Plant	1.0570	.,		10/0
331.0	Structures & Improvements	2.34%	80	R2.5	-15%
332.0	Water Treatment Equipment	2.18%	48	R1.5	-20%
333.0	Miscellaneous Water Treat, Other	3.33%	30	SQ	0%
00010	Transmission and Distribution	010070		54	0,0
341.0	Structures & Improvements	1.49%	55	R2.5	-20%
341.1	Structures & Improve - Special Crossing	1.49%	55	R2.5	-20%
342.0	Distribution Reservoirs & Standpipes	1.70%	65	R2.5	-25%
343.0,1,2,3	Transmission & Distribution Mains	1.39%	90	R2.0	-30%
344.0	Fire Mains	1.56%	85	S1	-30%
345.0	Customer Services	2.92%	65	R2.0	-100%
346.0	Customer Meters	2.40%	42	R1.5	-10%
347.0	Customer Meter Pits & Installation	2.40%	42	R1.5	-10%
348.0	Fire Hydrants	1.85%	65	R1.5	-30%
349.0	Misc Trans & Dist – Other	2.96%	50	R3	0%
313.0	General Plant	2.50%	50	113	0/0
390.0	Structures & Improve - Shop & Garage	3.02%	55	R2.5	-20%
390.1	Structures & Improve - Office Buildings	2.09%	47	SO	-20%
390.3	Structures & Improve – Miscellaneous	3.72%	55	R2.0	-20%
390.9	Structures & Improve – Leasehold	2.75%	25	R4	0%
391.0	Office Furniture	3.49%	20	SQ	0%
391.1	Computer & Peripheral Equipment	19.06%	5	SQ	0%
391.2	Computer Hardware & Software	19.06%	5	SQ	0%
391.25	Computer Software	5.00%	20	SQ	0%
391.25	Personal Computer Software	10.00%	10	SQ	0%
391.20	Other Office Equipment	10.46%	15	SQ	0%
391.3	BTS Initial Investment	5.00%	20	30	0%
391.4 392.1	Transportation Equipment - Light trucks	5.57%	9	L1.5	0% 15%
392.1 392.2	Transportation Equipment - Light trucks Transportation Equipment - Heavy trucks	0.00%	9 10	L1.5 L1.5	15%
392.2 392.3	Transportation Equipment – Heavy trucks	0.00%	6	L1.5 L1.5	15%
392.3 392.4	Transportation Equipment – Autos	6.15%	15	S3	15% 5%
392.4 393.0					
	Stores Equipment Tools, Shop, Garage Equipment	3.88%	25	SQ	0%
394.0		3.73%	20	SQ	0%
395.0	Laboratory Equipment	3.90%	15	SQ	0%
396.0	Power Operated Equipment	3.79%	12	L1	20%
397.1	Communication Equip - Non Telephone	5.76%	15	SQ	0%
397.2	Communication Equip – Telephone	8.94%	10	SQ	0%
398.0 399.0	Miscellaneous Equip	6.48%	15	SQ	0%
399 ()	Other Tangible Equipment	2.43%	20	SQ	0%

Case No. WA-2022-0229 Attachment E Page 1 of 2

MISSOURI AMERICAN WATER COMPANY – Sewer

Schedule of Depreciation Rates

WR-2020-0344

USOA Account Number	Account Description	Remaining Life Depreciation Rate %	Average Service Life (Years)	lowa Curves	% Net Salvage
Number	Collection Diant	Rale %	(rears)		
254	Collection Plant	2.020/	50	52	F 0/
351	Structures & Improvements	2.03%	50	R3	-5%
352.1	Collection Sewers (Force)	1.64%	60	R2.5	-10%
352.2	Collection Sewers (Gravity)	1.58%	70	R3	-20%
353	Services To Customers	2.87%	55	R2.0	-40%
354	Flow Measuring Devices	3.38%	25	S2.5	0%
356	Other Collection Equipment	3.15%	50	60	0%
357	Communication Equipment	6.67%	15	SQ	0%
264	Pumping Plant	2 470/	45	52	00/
361	Structures & Improvements	2.17%	45	R3	0%
362	Receiving Wells	2.87%	30	L2.5	0%
363	Electric Pumping Equip, (Includes Generators)	4.31%	15	L1.5	-5%
364	Diesel Pumping Equipment	4.31%	15	L1.5	-5%
365	Other Pumping Equipment	4.31%	15	L1.5	-5%
	Treatment and Disposal Plant				
371	Structures & Improvements	1.43%	60	R2.5	-5%
372	Treatment & Disposal Equipment	3.97%	30	S0.5	-20%
	(Includes pumps, blowers, generators)				
373	Plant Sewers	1.60%	50	R2.5	0%
374	Outfall Sewer Lines	3.04%	35	L2.0	0%
	General Plant				/
390.0	Structures & Improve – General	3.11%	35	R2.5	-5%
390.9	Structures & Improve – Leasehold	5.00%	20	R4	0%
391.0	Office Furniture	5.00%	20	SQ	0%
391.1	Computer & Peripheral Equipment	20.00%	5	SQ	0%
391.2	Computer Hardware & Software	20.00%	5	SQ	0%
391.25	Computer Software	5.00%	20	SQ	0%
391.26	Personal Computer Software	10.00%	10	SQ	0%
391.3	Other Office Equipment	6.67%	15		0%
391.4	BTS Initial Investment	5.00%	20		0%
392.0	WW Transportation Equipment	3.45%	10	L2.5	5%
392.1	Transportation Equipment - Light trucks	3.45%	10	L2.5	5%
392.2	Transportation Equipment - Heavy trucks	3.45%	10	L2.5	5%
392.3	Transportation Equipment – Autos	3.45%	10	L2.5	5%
392.4	Transportation Equipment – Other	3.45%	10	L2.5	5%
393.0	Stores Equipment	4.00%	25	SQ	0%
394.0	Tools, Shop, Garage Equipment	5.00%	20	SQ	0%
395.0	Laboratory Equipment	6.67%	15	SQ	0%
396.0	Power Operated Equipment	7.71%	15	L2.5	0%
397.1	Communication Equip - Non Telephone	6.67%	15	SQ	0%
397.2	Communication Equip – Telephone	6.67%	15	SQ	0%
398.0	Miscellaneous Equip	6.43%	15	SQ	0%
399.0	Other Tangible Equipment	0.00%	30	R2.0	0%