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OF COUNSEL RICHARD T. CIOTTONE

June 21, 2002

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Re: WO-2002-273

Dear Mr. Roberts:

Enclosed for filing on behalf of Missouri-American Water Company, please find an original and eight (8) copies of MAWC's Supplemental Statement of Position.

Copies of this filing will be provided to all parties of record.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely,

BRYDON,/SWEARENGEN & ENGLAND, P.C.

By:

Dean L. Cooper

DLC/lar Enclosure

cc: Keith Krueger Ruth O'Neill Stuart W. Conrad James B. Deutsch Jeremiah Finnegan Jan Bond

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

In the Matter of the Joint Application of Missouri-American Water Company, St. Louis County Water Company d/b/a Missouri-American Water Company and Jefferson City Water Works Company d/b/a Missouri-American Water Company for an accounting authority order relating to security costs.

Case No. WO-2002-273

# MAWC'S SUPPLEMENTAL STATEMENT OF POSITION

COMES NOW Missouri-American Water Company ("MAWC" or the "Company")<sup>1</sup>, and supplements its positions on certain issues to be heard at the evidentiary hearing in this case by stating as follows to the Missouri Public Service Commission ("Commission"):

1. MAWC originally requested an Accounting Authority Order ("AAO") which

would delay amortization of the deferred amounts until the effective date of rates for a future rate case. After further consideration of this issue, review of the Staff's testimony and review of the Office of the Public Counsel's ("Public Counsel") proposals, MAWC seeks to supplement its position.

2. MAWC now takes the position that if the Commission grants an AAO in this case, amortization of the deferred amounts, on a twenty year basis, should begin with the effective date of a Report and Order in this case. Additionally, MAWC takes the position that it does not oppose a Commission order granting an AAO which contains language

<sup>&</sup>lt;sup>1</sup> This case was initially filed by Missouri-American Water Company, St. Louis County Water Company d/b/a Missouri-American Water Company and Jefferson City Water Works Company d/b/a Missouri-American Water Company. Effective December 31, 2001, St. Louis County Water Company and Jefferson City Water Works Company were merged into Missouri-American Water Company. Thus, Missouri-American Water Company is the remaining applicant.

similar to the following:

"That nothing in the Order shall be considered a finding by the Commission of the value for rate making purposes of the deferred expenditures."

- 3. This results in the following supplemental positions on the specified issues:
  - 3. If the Commission grants MAWC an Accounting Authority Order:

# A. What conditions, if any, should be reflected in the Commission's order?

**Company Position:** An Order granting an AAO in this case should direct that MAWC begin to amortize the deferred amounts, on a twenty year basis, beginning with the effective date of a Report and Order in this case

B. Should the Commission make any indications regarding future ratemaking treatment of the deferred expenditures in the Commission's order? If so, what indications should the Commission make?

**Company Position:** An order granting an AAO should contain the following provision:

"That nothing in the Order shall be considered a finding by the Commission

of the value for rate making purposes of the deferred expenditures."

WHEREFORE, MAWC respectfully requests that the Commission consider the

above supplemental positions in preparation for the hearing of this case.

Respectfully submitted,

Dean L. Cooper MBE#36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 voice (573) 635-3847 facsimile <u>dcooper@brydonlaw.com</u> e-mail ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, on this 21/4 day of June, 2002, to the following:

Mr. Keith Krueger Missouri PSC P.O. Box 360 Jefferson City, MO 65102

Mr. James B. Deutsch Blitz, Bargette & Deutsch 308 E. High, Suite 301 Jefferson City, MO 65101 Ms. Ruth O'Neill OPC P.O. Box 7800 Jefferson City, MO 65102

Mr. Jeremiah Finnegan Finnegan,Conrad, et al. Penntower Office Center 3100 Broadway, Suite 1209 Kansas City, MO 64111 Mr. Stuart W. Conrad Finnegan,Conrad & Peterson,L.C. Penntower Office Center 3100 Broadway, Suite 1209 Kansas City, MO 64111

Ms. Jan Bond Diekemper, Hammond, et al. 7730 Carondelet, Suite 200 St./Louis, MO 63105