

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

In the matter of the Petition of Missouri-)
American Water Company for Approval) **File No. WO-2015-0211**
to Change its Infrastructure System)
Replacement Surcharge (ISRS).)

**THE OFFICE OF THE PUBLIC COUNSEL’S STATEMENT
IN SUPPORT OF STAFF**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Statement in Support of Staff states as follows:

1. On June 3, 2015, an evidentiary hearing was held before the Missouri Public Service Commission (Commission) regarding Missouri-American Water Company’s (MAWC’s) proposed change to its Infrastructure System Replacement Surcharge (ISRS). Public Counsel had no witnesses and sponsored no testimony in this matter.
2. On June 12, 2015, the Staff of the Missouri Public Service Commission (Staff) filed its Post-Hearing Brief.
3. In its Brief, Staff recommends the Commission include the amounts of reconciled revenues from an ISRS when calculating the 10% ISRS cap on additional revenue requirement as being consistent with the language of the statute and the purpose of the ISRS. Based on that, Staff recommends that the Commission allow an additional \$254,789 in ISRS revenues in this current petition to prevent authorization of ISRS revenues in excess of the 10% cap. Furthermore, Staff recommends to the Commission that it deny permitting MAWC from booking any under reconciled amounts as a regulatory asset as being an unauthorized exercise of

authority not granted to the Commission by the statute. Finally, Staff provides its explanation and calculations of arriving at the appropriate authorized annualized revenue requirement for the ISRS and recommends the Commission adopt that position. (Staff's Post-Hearing Brief, pg. 3-4 & 16)

4. Public Counsel now offers its statement in support of the testimony and recommendations of Staff. Public Counsel agrees with Staff that to authorize the full amount of the ISRS revenues requested in MAWC's current petition would violate the 10% cap provision found in Section 393.1003 RSMo.

WHEREFORE, Public Counsel respectfully submits its statement of support of Staff on the issues in this case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 12th day of June 2015:

/s/ Christina L. Baker
