

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

In the Matter of Missouri-American Water )  
Company's Request for Authority to )  
Implement General Rate Increase for Water )  
and Sewer Service Provided in Missouri )  
Service Areas )

Case No. WR-2022-0303

**STATEMENT OF DISCOVERY DISPUTE/CONCERN**

Comes now the Office of the Public Counsel (the “OPC”) and pursuant to the Public Service Commission of the State of Missouri’s (the “Commission) Order Setting Procedural Schedule (Doc. 44)<sup>1</sup> respectfully states as follows:

1. On August 17, 2022, the Commission entered an Order Setting Procedural Schedule.
2. In the Order Setting Procedural Schedule, the Commission scheduled several Discovery Conferences and stated that “[n]ot less than three (3) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved.” (Order Setting Procedural Schedule 6, Doc. 44).
3. The OPC has several discovery disputes and/or concerns with Missouri American Water Company (“MAWC”), in that, MAWC has not provided responses to or complete answers to the questions posed by the OPC in Data Requests 3001, 3010, 3018, and 3019.

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<sup>1</sup> References to document numbers represent the document numbers assigned in the Electronic Filing Information System (“EFIS”).

4. The OPC has previously discussed and is continuing discussions of these discovery disputes/concerns with MAWC.

WHEREFORE, the Office of the Public Counsel respectfully submits this Statement of Discovery Dispute/Concern and requests that the Commission hold the discovery conference currently scheduled for January 12, 2023, to address these discovery disputes.

Respectfully submitted,

/s/ Lindsay VanGerpen  
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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 9th day of January 2023.

/s/ Lindsay VanGerpen