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FILED<sup>2</sup>

Service Commission

December 9, 2003

Missouri Public Service Commission Attn: Secretary of the Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102-0360

Re:

Case No. WR-2003-0500

Missouri-American Water Company

Dear Mr. Roberts:

Please find enclosed for filing in the above-reference case an original and eight (8) copies each of the Position Statement of the City of Warrensburg and Motion to Accept Position Statement of the City of Warrensburg One Day Late.

A copy of this filing has been sent this date to counsel for all parties of record.

Very Truly Yours,

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Leland B. Curtis

LBC/klb Enclosure

cc: Counsel for All parties of record



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

Service Commission
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In the Matter of Missouri-American Water	1		Service Comm
Company's Tariff to Revise Water and	)	Case No. WR-2003-0500	
Sewer Rate Schedules	)		

#### STATEMENT OF POSITION THE CITY OF WARRENSBURG

COMES NOW Intervenor City of Warrensburg ("Warrensburg") by and through counsel, and pursuant to the Commission's Order, issued in the above-captioned case on July 17, 2003, for its Statement of Position states as follows:

1. On Issues 1-20 and 26-38, Warrensburg generally supports the staff, but reserves the right to take a position on any issue after hearing all of the evidence.

#### Rate Design Issues:

21. What is the appropriate way to allocate costs among MAWC's various operating districts?

The costs for each district should be determined based on the costs directly attributed to the cost of serving that particular district. General and administrative costs (overhead) should be allocated to each of the districts on a reasonable and fair method.

22. What is the appropriate way in which to allocate costs among customer classes within each operating district?

Warrensburg takes no position at this time but reserves the right to take a position after hearing all of the evidence.

23. What is the appropriate way to design rates for each customer class?

Class cost of service pricing should be utilized in each district based on each districts unique cost of service for each class.

# 24. Should there be any revenue contribution among districts to mitigate the impact of full, costs of service rates for any district?

Rate payers in one district should not be required to subsidize service costs in any other district.

#### 25. Should there be consolidated billing?

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Warrensburg takes no position on this issue at this time, but reserves the right to take a position after hearing all of the evidence.

Respectfully Submitted,

CURTIS, OETTING, HEINZ, GARRET & O'KEEFE, P.C.

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#### **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was mailed this 9th day of December, 2003, by placing same in the U.S. Mail postage prepaid to:

Cliff Snodgrass Missouri Public Service Commission Governor State Office Building, 8<sup>th</sup> Floor Jefferson City, MO 65101

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