

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

In the Matter of Missouri-American Water )	
Company's Request for Authority to )	Case No. WR-2015-0301
Implement a General Rate Increase for )	Case No. SR-2015-0302
Water and Sewer Service Provided in )	
Missouri Service Areas. )	

**ERRATA TO REBUTTAL TESTIMONY OF LENA MANTLE**

**COMES NOW** the Missouri Office of the Public Counsel and for its Errata to the Rebuttal Testimony of Mrs. Lena Mantle, hereby submits the attached page 20 to replace the page 20 from Mrs. Mantle's rebuttal testimony previously filed on February 11, 2016. The only change from the original page 20 to the replacement page 20 is to correct two numbers in the table appearing on page 20: (1) The 20<sup>th</sup> Century Average temperature should be 75.3 rather than 75.6; and (2) The 20<sup>th</sup> Century average rainfall should be 3.66 rather than 1.91. No party should be prejudiced by these errata.

WHEREFORE, the Office of the Public Counsel respectfully submits these errata through the attached and revised page 20 that replaces the previously filed page 20.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 19<sup>th</sup> day of February 2016.

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**AFFIDAVIT OF LENA MANTLE**

STATE OF MISSOURI    )  
  )    ss  
COUNTY OF COLE    )

Lena Mantle, of lawful age and being first duly sworn, deposes and states:

1. My name is Lena Mantle. I am a Senior Analyst for the Office of the Public Counsel.
2. Attached hereto and made a part hereof for all purposes is an errata to my rebuttal testimony.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

  
Lena M. Mantle  
Senior Analyst

Subscribed and sworn to me this 17<sup>th</sup> day of February 2016.



JERENE A. BUCKMAN  
My Commission Expires  
August 23, 2017  
Cole County  
Commission #13754037

  
Jerene A. Buckman  
Notary Public

My Commission expires August 23, 2017.

1 usage, MAWC needs to understand why the usage of its customers was higher just that one  
2 month and whether or not it is likely to ever occur again.

3 For instance, if it was due to weather, MAWC needs to understand if it was due to  
4 extreme temperature or lack of rainfall or both.

5 **Q. Do you believe weather conditions caused this large increase in usage shown**  
6 **in the billing data for August, 2012?**

7 A. Although I have not done an extensive analysis of the weather, I do not think that the large  
8 usage in 2012 is due to weather. The chart below shows the average temperature and the  
9 total rainfall for the National Oceanic and Atmospheric Administration (“NOAA”) area  
10 that includes St. Louis County for the month of August for each year from 2010 to 2014.  
11 As a comparison point, the twentieth century average for each of these measures of weather  
12 from the NOAA website<sup>7</sup> is also shown.

	Average	
	Temperature	Rainfall
Aug 2010	77.8	3.74
Aug 2011	77.0	2.25
Aug 2012	75.6	1.91
Aug 2013	74.4	1.09
Aug 2014	75.3	5.68
20 <sup>th</sup> Century Avg	75.3	3.66

13  
14 As shown in this table, August 2010 was neither the hottest August of the five years nor the  
15 driest. However, to truly be able to understand why the usage was so high and extensive  
16 analysis of the bills rendered and the weather across time would need to be conducted.

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<sup>7</sup> <https://www.ncdc.noaa.gov/temp-and-precip/climatological-rankings/index.php?periods%5B%5D=1&parameter=tavg&state=23&div=2&month=8&year=2010>