

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	Case Nos. WR-2017-0285
General Rate Increase for Water and Sewer)	SR-2017-0286
Service Provided in Missouri Service Areas.)	

**FIRST STATEMENT OF POSITIONS
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers ("MIEC") and for its First Statement of Positions states as follows:

This Statement of Positions reflects the positions of the MIEC on the issues that the MIEC understands will be presented to the Commission in the first two days of hearings. The MIEC will file a Second Statement of Positions on the remaining issues on February 21.

POSITIONS

1. Preliminary Matters Opening Statements: The MIEC has no position on this issue.
2. Overview and Regulatory Policy: The MIEC has no position on this issue.
3. Future Test Year: The MIEC opposes the use of a future test year in this case, and recommends that the test year be the twelve months ended June 30, 2017, true-up for known and measurable changes through December 31, 2017.
4. Allocations: The MIEC has no position on this issue.
5. Production Costs a. Waste Disposal: The MIEC supports the Staff position on this issue.
6. Property Tax: Only the actual property taxes paid in 2017 before the end of the true-up (December 31, 2017) should be included in the calculation of revenue requirement.

7. Cloud Computing: The MIEC has no position on this issue.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Lewis Mills

Lewis R. Mills, #35275

Edward F. Downey, # 28866

Bolivar Street, Suite 101

Jefferson City, MO 65101

Telephone: (573) 556-6620

Facsimile: (573) 556-6630

E-mail: lewis.mills@bryancave.com

efdowney@bryancave.com

Diana M. Vuylsteke, # 42419

211 N. Broadway, Suite 3600

St. Louis, Missouri 63102

Telephone: (314) 259-2543

Facsimile: (314) 259-2020

E-mail: dmvuylsteke@bryancave.com

Attorneys for the Missouri Industrial
Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 20th day of February, 2018, to all parties on the Commission's service list in this case.

/s/ Lewis Mills