

Exhibit No.:
Issue(s): *Rate Design*
Witness: *Matthew J. Barnes*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal Testimony*
Case No.: *WR-2018-0170*
Date Testimony Prepared: *August 7, 2018*

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

WATER AND SEWER DEPARTMENT

SURREBUTTAL TESTIMONY

OF

MATTHEW J. BARNES

**LIBERTY UTILITIES (MISSOURI WATER), LLC
D/B/A LIBERTY UTILITIES**

CASE NO. WR-2018-0170

*Jefferson City, Missouri
August 2018*

1 **SURREBUTTAL TESTIMONY**

2 **OF**

3 **MATTHEW J. BARNES**

4 **LIBERTY UTILITIES (MISSOURI WATER), LLC**
5 **D/B/A LIBERTY UTILITIES**

6 **CASE NO. WR-2018-0170**
7

8 Q. Please state your name and business address.

9 A. Matthew J. Barnes, P.O. Box 360, Jefferson City, Missouri, 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”)
12 as a Utility Regulatory Auditor IV.

13 Q. Are you the same Matthew J. Barnes who sponsored Direct Testimony on
14 June 22, 2018, and Rebuttal Testimony on July 20, 2018?

15 A. Yes.

16 Q. What is the purpose of your Surrebuttal Testimony?

17 A. The purpose of my Surrebuttal Testimony is to respond to Silverleaf Resorts,
18 Inc. (“Silverleaf”) witness William G. Stannard’s refiled Rebuttal Testimony regarding
19 portions of Staff’s rate design proposal. I also briefly address the update to Staff’s rate
20 design.

21 **Response to Silverleaf’s Witness Mr. Stannard**

22 Q. What is Mr. Stannard’s major criticism of Staff’s proposed rate design for
23 Silverleaf?

Surrebuttal Testimony of
Matthew J. Barnes

1 A. Mr. Stannard's major criticism of Staff's proposed rate design for Silverleaf is
2 that Staff shifts too many dollars to the customer charge.

3 Q. Are Silverleaf's water users typical permanent residential customers?

4 A. No. Staff considers Silverleaf's water users to be unique in that a majority of
5 Silverleaf's properties do not house permanent residents. Rather, Silverleaf's properties
6 consist of timeshare and condominium owners who rent these units to thousands of their
7 customers each year. There are times that these units are not occupied, generally in the
8 off-season such as late fall through the winter; therefore, a unit will have little to zero usage
9 for that particular month. At times when there is little to zero usage, an operator must still
10 maintain the system so water is readily available to meet peak demands. The costs to
11 maintain the system from zero usage to peak demand is generally a fixed cost. This is one
12 reason Staff shifted more dollars to the fixed charge. Further, in order to create a reasonable
13 balance between fixed and variable charges, Staff allocated the cost of service to minimize the
14 rate impact on customers and concluded that a fixed charge of \$26.73¹ and a commodity
15 charge of \$6.75 would be just and reasonable and allow Liberty the opportunity to recover its
16 cost of service.

17 Q. Do you have an example?

18 A. Yes. Mr. Stannard uses data from 2017 to conduct a bill frequency analysis.
19 Of the roughly 7,000 monthly bills, two accountholders account for over 3,000 of those
20 monthly bills. Of those two accountholders, 1,300 monthly bills have zero usage. However,
21 those same two accountholders also have the highest (2,100) monthly bills as well.

¹ Staff updated the cost of service and therefore, the rate design for Silverleaf in its Rebuttal Testimony filed July 20, 2018. See the workpapers of Matthew J. Barnes.

1 Q. What does that above information show?

2 A. This information shows that these accountholders put a tremendous strain on
3 the system. To ensure that the system is capable of producing sufficient usage during peak
4 usage, the system has to be built to meet peak demand. Thus, the accountholders who are
5 causing the highest stress on the system should be the ones paying for that system. Thus,
6 even if a substantial amount of the accountholders monthly bills are for zero usage, the system
7 has to be built to support the one or two months when usage is maxed. This means that the
8 fixed costs for having a properly sized system should be collected from those customers every
9 month through the customer charge.

10 Q. What is Mr. Stannard's proposed alternative rate design?

11 A. Mr. Stannard proposes an "across the board"² increase of 76.1% for water and
12 70.7% for sewer for all of Silverleaf's meter sizes. While Staff does not generally disagree
13 with this approach, his commodity charge is \$10.50 and \$29.43 per 1,000 gallons of usage for
14 water and sewer respectively. If the Commission accepts Mr. Stannard's proposal, the
15 customer charge would be on average for the state. However, the commodity charge for water
16 would be the second highest for the state and the commodity charge for sewer would be the
17 highest under PSC regulation. See Schedule MJB-s1 for a list of PSC regulated water and
18 sewer utilities ranked by commodity charge and customer charge.

19 Q. Mr. Stannard claims that low usage customers suffer the most with Staff's
20 proposed rate design. What is your response?

21 A. Using Staff's rate design proposal, a low usage customer's bill is not much
22 different compared to Mr. Stannard's proposed alternative rate design. Based on water usage

² Page 23, lines 1 through Page 24, line 4 in the refiled Rebuttal Testimony of William G. Stannard.

1 of 2,000 gallons per month, a customer's monthly bill would be \$3.56 higher under Staff's
2 rate design proposal than Mr. Stannard's proposed alternative rate design. For sewer
3 customers, based on water usage of 2,000 gallons per month, a customer's bill would be
4 68 cents less under Staff's rate design proposal than Mr. Stannard's proposed alternative rate
5 design proposal. See Tables 1 and 2 below.

6 Q. Can you provide a bill comparison based on different customer usage that
7 shows the impact of Staff's rate design proposal versus Mr. Stannard's alternative rate design
8 proposal?

9 A. Yes. Tables 1 and 2 below show the bill comparison of Staff's proposal
10 compared to Mr. Stannard's alternative proposal based on different customer usage for water
11 and sewer.

Table 1						
Water						
	<u>2,000 Gallons</u>		<u>3,000 Gallons</u>		<u>4,000 Gallons</u>	
Staff	\$	40.34	\$	47.09	\$	53.84
Mr. Stannard	\$	36.78	\$	47.28	\$	57.78
Difference	\$	3.56	\$	(0.19)	\$	(3.94)
		<u>Fixed Charge</u>		<u>Commodity Charge</u>		
Staff	\$	26.84	\$	6.75		
Mr. Stannard	\$	15.78	\$	10.50		

Table 2						
Sewer						
	<u>2,000 Gallons</u>		<u>3,000 Gallons</u>		<u>4,000 Gallons</u>	
Staff	\$	85.50	\$	111.08	\$	136.66
Mr. Stannard	\$	86.18	\$	115.61	\$	145.04
Difference	\$	(0.68)	\$	(4.53)	\$	(8.38)
		<u>Fixed Charge</u>		<u>Commodity Charge</u>		
Staff	\$	34.34	\$	25.58		
Mr. Stannard	\$	27.32	\$	29.43		

1 By shifting more dollars to the commodity charge as Mr. Stannard proposes, the more
2 water a customer uses the higher the bill will be versus Staff's proposal. Mr. Stannard's
3 proposal breaks from typical factoring by meter size and instead applies an across the board
4 percentage multiplier. While there is no absolute correct answer when considering rate
5 design, Staff is concerned that Mr. Stannard's proposal shifts significant amounts of cost
6 recovery away from the largest 3-inch meter customers and a greater percentage onto the
7 1-inch and 2-inch meter customers. Staff's rate design is reasonable as it properly allocates
8 the fixed and variable charges that minimize the impact on customer bills while allowing
9 Liberty the opportunity to recover its cost of service.

10 Q. What would be the difference for the larger meter sized customers?

11 A. Table 3 shows the difference for the larger meter sized customers, based on
12 Staff's proposed rate design and compared to Mr. Stannard's proposed rate design.

Meter Size	Staff Proposed Customer Charge	Staff Proposed Commodity Charge	Mr. Stannard's Proposed Customer Charge	Mr. Stannard's Proposed Commodity Charge	Staff's Proposed Bill (Average Usage)	Mr. Stannard's Proposed Bill (Average Usage)	Silverleaf Average Water Usage in 1,000 Gallons	Number of Customers
3/4"	\$ 26.84	\$ 6.75	\$ 15.78	\$ 10.50	\$ 39.51	\$ 35.49	1,209	644
1"	\$ 45.63	\$ 6.75	\$ 26.29	\$ 10.50	\$ 96.40	\$ 105.27	158	21
2"	\$ 107.37	\$ 6.75	\$ 84.10	\$ 10.50	\$ 217.98	\$ 256.16	1,311	80
3"	\$ 295.25	\$ 6.75	\$ 157.69	\$ 10.50	\$ 354.06	\$ 249.17	87	10

14 Q. On page 25 in his refiled Rebuttal Testimony, Mr. Stannard presents Table 13
15 that shows fixed charge comparisons with different water and sewer companies in the state.
16 What is your response?

17 A. Mr. Stannard uses six (6) water companies in Missouri to compare their fixed
18 charge to Silverleaf's fixed charge. Five (5) of his example water companies are

1 municipalities. Municipal rates are usually not comparable to the rates of privately owned
2 systems due to the significant economic advantages associated with a publicly owned system.
3 In addition to being not-for-profit, municipalities have access to grants, federally subsidized
4 loans, and have the ability to use additional funds from other sources within the municipality
5 to keep rates low. Table 4 below shows a sample comparison of Staff's proposed customer
6 charge for Silverleaf compared to other similar water companies that are regulated by the
7 Commission. Schedule MJB-s1 shows all of the water and sewer utilities regulated by the
8 Commission ranked by commodity charge and customer charge.

Table 4	
Company Name	Current Customer Charge
Silverleaf	\$ 26.84
Firefox Utility Company	\$ 20.10
Riverfork	\$ 21.56
Missouri American Water	\$ 9.00
Osage Water	\$ 24.76
Hillcrest Utility Water Company	\$ 40.48

9
10 Q. Did Mr. Stannard provide Missouri-American Water Company's ("MAWC")
11 sewer rate in his table?

12 A. No he did not.

13 Q. What is MAWC's sewer customer charge?

14 A. MAWC's sewer customer charge is \$58.13 compared to Mr. Stannard's
15 average sewer customer charge of \$16.38 as shown in Table 13 of his Rebuttal Testimony.

Surrebuttal Testimony of
Matthew J. Barnes

1 Q. Mr. Stannard proposes a phase-in of Silverleaf's water and sewer rates. Will
2 you be addressing this issue?

3 A. No. Mr. James Busch will address Mr. Stannard's proposal to phase-in
4 Silverleaf's water and sewer rates.

5 Q. Did Staff update its rate design proposal?

6 A. Yes. Staff updated its rate design proposal which can be found in its
7 workpapers. Staff also updated its EMS runs to reflect increases in rate case expense. See the
8 Surrebuttal Testimony of Paul Harrison.

9 Q. Does this complete your Surrebuttal Testimony?

10 A. Yes, it does.

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

In The Matter of the Application of Rate Increase for)
Liberty Utilities (Missouri Water), LLC d/b/a)
Liberty Utilities) **Case No. WR-2018-0170**

AFFIDAVIT OF MATTHEW J. BARNES

State of Missouri)
) ss
County of Cole)

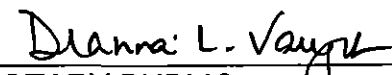
COMES NOW Matthew J. Barnes, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony*; and that the same is true and correct according to his best knowledge and belief. Further the Affiant sayeth not.



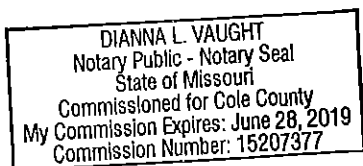
Matthew J. Barnes

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 31st day of July, 2018.



NOTARY PUBLIC



RANKED WATER CUSTOMER CHARGE

Name of Company	Type of Service		Date of Last Effective Tariff	Service Area	Customer Charge	Commodity Rate	Average Bill (Monthly)
Middle Fork*	Water		May 1, 2011		\$ -	\$2.71 per 1,000	\$ 13.55
Willows Utility	Combo	W	April 1, 1995	W	\$ 5.23	\$1.21 per 1,000 (over 1,000)	\$ 10.07
Smithview H2O	Water		June 5, 2009		\$ 5.31	\$3.36 per 1,000	\$ 22.11
Franklin County Water Company	Water		October 15, 2006		\$ 5.70	\$2.61 per 1,000	\$ 18.75
Highway H Utilities	Combo	W	January 15, 2010	W	\$ 6.16	\$1.13 per 1,000 (over 2,000)	\$ 9.55
Missouri Utilities	Combo	W	July 10, 2009	W	\$ 6.34	\$1.05 per 1,000 (over 4,500)	\$ 6.87
Liberty Utilities-Franklin County	Water		April 21, 2006		\$ 6.54	\$2.44 per 1,000	\$ 18.74
Liberty Utilities-Jefferson County	Water		April 21, 2006		\$ 6.54	\$2.44 per 1,000	\$ 18.74
SK & M Water & Sewer	Combo	W	May 13, 2010	W	\$ 6.55	\$2.75 per 1,000	\$ 20.30
Public Funding of Ozark	Water		March 8, 1996		\$ 6.68	\$2.93 per 1,000 (over 2,000)	\$ 15.47
Rex Deffenderfer	Water		November 26, 2016		\$ 7.72	\$1.89 per 1,000	\$ 17.17
Liberty Utilities-Noel	Water		November 12, 2009		\$ 7.76	\$1.80 per 1,000	\$ 16.76
Liberty Utilities-Cedar Hill Estates	Water		April 21, 2006		\$ 8.68	\$1.84 per 1,000	\$ 17.88
Liberty Utilities-Holiday Hills	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
Liberty Utilities-Ozark Mountain	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
Liberty Utilities-Timber Creek	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
MAWC-St. Louis County	Combo	W	May 18, 2018	W	\$ 9.00	\$4.7814 per 1,000	\$ 32.91
MAWC-All Others	Combo	W	May 18, 2018	W	\$ 9.00	\$6.2469 per 1,000	\$ 40.23
Midland Water	Water		December 29, 2015		\$ 9.49	\$4.71 per 1,000	\$ 33.04
Lake Northwoods Utility	Combo	W	May 21, 1984	W	\$ 9.70	\$2.83 per 1,000 (over 2,000)	\$ 18.19
Raytown	Water		December 7, 2015		\$ 11.31	\$7.11 per 1,000	\$ 46.86
Seges	Combo	W	December 31, 2009	W	\$ 12.49	\$2.37 per 1,000	\$ 24.34

RANKED WATER CUSTOMER CHARGE

Taney County Water	Water		December 29, 2015		\$ 12.55	\$5.63 per 1,000	\$ 40.70
Empire District Electric	Water		November 23, 2012		\$ 12.93	\$4.30 per 1,000	\$ 34.43
Port Perry Service	Combo	W	May 15, 2002	W	\$ 13.23	\$3.58 per 1,000 (over 2,000)	\$ 23.97
Ridge Creek	Water		October 22, 2015		\$ 14.27	\$3.47 per 1,000	\$ 31.62
Spokane Highlands	Water		May 1, 2015		\$ 14.67	\$4.22 per 1,000	\$ 35.77
Lake Region Water & Sewer	Combo	W	June 4, 2014	W	\$ 14.79	\$2.84 per 1,000 (over 3,000)	\$ 20.47
Terre Du Lac Utilities	Combo	W	Septemer 29, 2017	W	\$ 14.85	\$1.80 per 1,000	\$ 23.85
Oakbrier Water	Water		December 14, 2012		\$ 15.07	\$3.39 per 1,000 (over 2,000)	\$ 25.24
Holtgrewe Farms	Combo	W	January 5, 2011	W	\$ 15.10	\$4.66 per 1,000	\$ 38.40
Lakeland Heights Water	Water		December 14, 2012		\$ 15.50	\$5.63 per 1,000 (over 2,000)	\$ 32.39
Stockton Hills	Water		July 24, 2017		\$ 16.86	\$5.34 per 1,000 (over 1,000)	\$ 38.22
Bilyeu	Water		December 29, 2014		\$ 17.22	\$3.56 per 1,000	\$ 35.02
Gladlo Water & Sewer	Combo	W	May 18, 2017	W	\$ 17.25	\$2.15 per 1,000 (over 1,000)	\$ 25.85
Lincoln County Sewer & Water-Rockport	Combo	W	July 20, 2012	W	\$ 17.30	\$6.93 per 1,000	\$ 51.95
Evergreen Lake Water Company	Water		October 27, 2005		\$ 17.71	\$2.054 per 1,000	\$ 27.98
Woodland Manor	Water		June 28, 2013		\$ 19.11	\$3.62 per 1,000 (over 2,000)	\$ 29.97
Foxfire Utility Company	Combo	W	12/10/2002 (Stone County)	W	\$ 20.10	\$1.36 per 1,000 (over 2,000)	\$ 24.18
Whispering Hills	Water		September 12, 2009		\$ 20.69	\$3.67 per 1,000 (over 4,000)	\$ 24.36
Valley Woods	Combo	W	December 29, 2015	W	\$ 20.97	\$2.12 per 1,000	\$ 31.57
Riverfork	Water		December 29, 2015		\$ 21.56	\$2.08 per 1,000	\$ 31.96

RANKED WATER CUSTOMER CHARGE

Rogue Creek Utilities***	Combo	W	March 1, 2014	W	\$ 23.06	\$3.89 per 1,000	\$ 42.51
Lincoln County Sewer & Water-Bennington	Combo	W	July 20, 2012	W	\$ 23.34	\$5.33 per 1,000	\$ 49.99
Osage Water	Combo	W	September 19, 2009	W	\$ 24.76	\$5.86 per 1,000 (over 2,000)	\$ 42.34
Cedar Green Land Acquisition	Combo	W	August 1, 2013	W	\$ 26.79		\$ 26.79
MAWC-St. Louis County (Quarterly)	Combo	W	5/18/2018 (Quarterly)	W	\$ 27.00	\$4.7814 per 1,000	\$ 32.91
Moore Bend Water	Water		December 29, 2015		\$ 28.13	\$10.31 per 1,000	\$ 79.68
Village Greens	Water		August 20, 2015		\$ 29.59	\$3.43 per 1,000 (over 3,000)	\$ 36.45
Environmental Utilities	Water		January 20, 2018		\$ 29.86	\$5.81 per 1,000	\$ 58.91
Roy-L Utilities	Combo	W	July 1, 2016	W	\$ 33.24	\$3.08 per 1,000	\$ 48.64
Calvey Brook	Combo	W	December 31, 2004	W	\$ 36.36	\$2.05 per 1,000 (over 3,000)	\$ 40.46
Argyle Estates Water Supply	Water		March 22, 2002 (Quarterly)		\$ 37.94	\$2.46 per 1,000 (over 6,000)	\$ 12.65
Hillcrest Utility Operating Company	Combo	W	August 19, 2016	W	\$ 40.48	\$7.35 per 1,000	\$ 77.23
MAWC-All Others	Combo	W	May 18, 2018	W	\$ 48.40	Flat Rate	\$ 48.40
Indian Hills	Water		March 23, 2018	Winter	\$ 50.90	\$7.70 per 1,000	\$ 58.60
Indian Hills	Water		March 23, 2018	Summer	\$ 50.90	11.55 per 1,000	\$ 62.45
Branson Cedars Resort	Combo	W	November 1, 2015	W	\$ 56.29		\$ 56.29

RANKED SEWER CUSTOMER CHARGE

Name of Company	Type of Service		Date of Last Effective Tariff	Service Area	Customer Charge	Commodity Rate	Average Bill (Monthly)
Taney County Utility	Sewer	S	May 17, 2004		\$ 7.19	\$4.90 per 1,000 (up to 8,000)	\$ 31.69
Missouri Utilities	Combo	S	August 10, 2009	S	\$ 8.80		\$ 8.80
Lake Northwoods Utility	Combo	S	May 21, 1984	S	\$ 9.51		\$ 9.51
MPB-Lake Virginia	Sewer		November 1, 2014		\$ 13.33		\$ 13.33
Willows Utility	Combo	S	April 1, 1995	S	\$ 15.00		\$ 15.00
Liberty Utilities-Ozark Mountain	Sewer		April 2, 2007		\$ 16.00	\$17.24 per 1,000	\$ 102.20
Liberty Utilities-Timber Creek	Sewer		April 2, 2007		\$ 16.00	\$17.24 per 1,000	\$ 102.20
Port Perry Service	Combo	S	May 15, 2002	S	\$ 18.94		\$ 18.94
Terre Du Lac Utilities	Combo	S	September 29, 2017	S	\$ 19.41		\$ 19.41
Highway H Utilities	Combo	S	January 15, 2010	S	\$ 19.72		\$ 19.72
Warren County	Sewer		December 31, 1999		\$ 22.11		\$ 22.11
MPB-Villa Ridge	Sewer		November 1, 2014		\$ 24.24		\$ 24.24
Liberty Utilities-Cape Rock Village	Sewer		February 1, 2011		\$ 27.60		\$ 27.60
Timber Creek-Clay County	Sewer		May 6, 2011		\$ 28.50		\$ 28.50
Osage Water	Combo	S	September 19, 2009	S	\$ 29.02		\$ 29.02
SK & M Water & Sewer	Combo	S	May 13, 2010	S	\$ 29.36		\$ 29.36
PCB	Sewer		November 1, 2014		\$ 29.75		\$ 29.75
EMC of St.Charles County	Sewer		April 4, 2008		\$ 30.00		\$ 30.00
TBJ-Bourbeuse	Sewer		September 2, 2011		\$ 30.05		\$ 30.05
Mill Creek Sewers	Sewer		October 12, 2005		\$ 30.11		\$ 30.11
North Oak Sewer District	Sewer		April 14, 2004		\$ 30.16		\$ 30.16
Lake Region Water & Sewer-Shawnee Bend	Combo	S	June 4, 2014	S	\$ 32.19		\$ 32.19
Seges	Combo	S	May 15, 2015	S	\$ 32.53	\$4.65 per 1,000	\$ 55.78
MAWC-Arnold	Sewer District A		May 18, 2018		\$ 32.64		\$ 32.64
Lake Region Water & Sewer-Horseshoe Bend	Combo	S	June 4, 2014	S	\$ 33.08		\$ 33.08
Canon Home Association	Sewer		June 3, 2016		\$ 33.56	\$6.99 per 1,000 (over 1,000)	\$ 61.52
Calvey Brook	Combo	S	December 31, 2004	S	\$ 33.78		\$ 33.78
RD Sewer	Sewer		December 14, 2012		\$ 34.36		\$ 34.36
Roy-L Utilities	Combo	S	July 1, 2016	S	\$ 36.04		\$ 36.04
TBJ-Oak Hollow	Sewer		September 2, 2011		\$ 36.11		\$ 36.11
TBJ-St. John's	Sewer		September 2, 2011		\$ 36.59		\$ 36.59
Timber Creek-Platte County	Sewer		May 6, 2011		\$ 36.71		\$ 36.71
Gladlo Water & Sewer	Combo	S	May 18, 2017	S	\$ 37.67		\$ 37.67
Taneycomo Highlands	Sewer		July 7, 2006		\$ 38.00		\$ 38.00
MAWC Temple Terrace	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75

RANKED SEWER CUSTOMER CHARGE

MAWC-Anna Meadows	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Brooking Park	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Fenton	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Hickory Hills	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Jaxson Estates	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Maplewood	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Quail Run	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Westlake Village	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
Holtgrewe Farms	Combo	S	January 5, 2011	S	\$ 39.25		\$ 39.25
Lincoln County Sewer & Water-Rockport		S	August 19, 2014		\$ 39.68		\$ 39.68
Foxfire Utility Company	Combo	S	December 10, 2002	S	\$ 40.22	\$3.21 per 1,000 (over 2,000)	\$ 49.85
Valley Woods	Combo	S	December 29, 2015	S	\$ 42.16		\$ 42.16
Rogue Creek Utilities	Combo	S	March 1, 2014	S	\$ 44.16		\$ 44.16
Central Rivers Wastewater	Sewer		September 6, 2015		\$ 44.81		\$ 44.81
Lincoln County Sewer & Water-Bennington	Combo	S	August 19, 2014		\$ 46.87		\$ 46.87
Cedar Green Land Acquisition	Combo	S	August 1, 2013	W	\$ 47.55		\$ 47.55
Branson Cedars Resort	Combo	S	November 1, 2015	S	\$ 48.26		\$ 48.26
MAWC-Benton County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Branson Canyon	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Callaway County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Cedar Hill	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Cole County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13

RANKED SEWER CUSTOMER CHARGE

MAWC-Emerald Pointe	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Homestead Estates	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Incline Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Jefferson City	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Ozark Meadows	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Pevely Farms	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Platte County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Radcliffe Estates	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Saddlebrooke Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Stonebridge Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Wardsville	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
Mid-Mo Sanitation	Sewer		July 1, 2009		\$ 64.66		\$ 64.66
Raccoon Creek	Sewer		January 1, 2017		\$ 79.74		\$ 79.74
Hillcrest Utility Operating Company	Combo	S	August 19, 2016	S	\$ 83.56		\$ 83.56

RANKED WATER COMMODITY CHARGE

Name of Company	Type of Service		Date of Last Effective Tariff	Service Area	Customer Charge	Commodity Rate	Average Bill (Monthly)
Missouri Utilities	Combo	W	July 10, 2009	W	\$ 6.34	\$1.05 per 1,000 (over 4,500)	\$ 6.87
Highway H Utilities	Combo	W	January 15, 2010	W	\$ 6.16	\$1.13 per 1,000 (over 2,000)	\$ 9.55
Willows Utility	Combo	W	April 1, 1995	W	\$ 5.23	\$1.21 per 1,000 (over 1,000)	\$ 10.07
Foxfire Utility Company	Combo	W	12/10/2002 (Stone County)	W	\$ 20.10	\$1.36 per 1,000 (over 2,000)	\$ 24.18
Liberty Utilities-Noel	Water		November 12, 2009		\$ 7.76	\$1.80 per 1,000	\$ 16.76
Terre Du Lac Utilities	Combo	W	Septemer 29, 2017	W	\$ 14.85	\$1.80 per 1,000	\$ 23.85
Liberty Utilities-Cedar Hill Estates	Water		April 21, 2006		\$ 8.68	\$1.84 per 1,000	\$ 17.88
Rex Deffenderfer	Water		November 26, 2016		\$ 7.72	\$1.89 per 1,000	\$ 17.17
Calvey Brook	Combo	W	December 31, 2004	W	\$ 36.36	\$2.05 per 1,000 (over 3,000)	\$ 40.46
Evergreen Lake Water Company	Water		October 27, 2005		\$ 17.71	\$2.054 per 1,000	\$ 27.98
Riverfork	Water		December 29, 2015		\$ 21.56	\$2.08 per 1,000	\$ 31.96
Valley Woods	Combo	W	December 29, 2015	W	\$ 20.97	\$2.12 per 1,000	\$ 31.57
Gladlo Water & Sewer	Combo	W	May 18, 2017	W	\$ 17.25	\$2.15 per 1,000 (over 1,000)	\$ 25.85
Seges	Combo	W	December 31, 2009	W	\$ 12.49	\$2.37 per 1,000	\$ 24.34
Liberty Utilities-Franklin County	Water		April 21, 2006		\$ 6.54	\$2.44 per 1,000	\$ 18.74
Liberty Utilities-Jefferson County	Water		April 21, 2006		\$ 6.54	\$2.44 per 1,000	\$ 18.74
Argyle Estates Water Supply	Water		March 22, 2002 (Quarterly)		\$ 37.94	\$2.46 per 1,000 (over 6,000)	\$ 12.65
Franklin County Water Company	Water		October 15, 2006		\$ 5.70	\$2.61 per 1,000	\$ 18.75
Middle Fork*	Water		May 1, 2011		\$ -	\$2.71 per 1,000	\$ 13.55
SK & M Water & Sewer	Combo	W	May 13, 2010	W	\$ 6.55	\$2.75 per 1,000	\$ 20.30

RANKED WATER COMMODITY CHARGE

Lake Northwoods Utility	Combo	W	May 21, 1984	W	\$ 9.70	\$2.83 per 1,000 (over 2,000)	\$ 18.19
Lake Region Water & Sewer	Combo	W	June 4, 2014	W	\$ 14.79	\$2.84 per 1,000 (over 3,000)	\$ 20.47
Public Funding of Ozark	Water		March 8, 1996		\$ 6.68	\$2.93 per 1,000 (over 2,000)	\$ 15.47
Roy-L Utilities	Combo	W	July 1, 2016	W	\$ 33.24	\$3.08 per 1,000	\$ 48.64
Smithview H2O	Water		June 5, 2009		\$ 5.31	\$3.36 per 1,000	\$ 22.11
Oakbrier Water	Water		December 14, 2012		\$ 15.07	\$3.39 per 1,000 (over 2,000)	\$ 25.24
Village Greens	Water		August 20, 2015		\$ 29.59	\$3.43 per 1,000 (over 3,000)	\$ 36.45
Ridge Creek	Water		October 22, 2015		\$ 14.27	\$3.47 per 1,000	\$ 31.62
Bilyeu	Water		December 29, 2014		\$ 17.22	\$3.56 per 1,000	\$ 35.02
Port Perry Service	Combo	W	May 15, 2002	W	\$ 13.23	\$3.58 per 1,000 (over 2,000)	\$ 23.97
Woodland Manor	Water		June 28, 2013		\$ 19.11	\$3.62 per 1,000 (over 2,000)	\$ 29.97
Whispering Hills	Water		September 12, 2009		\$ 20.69	\$3.67 per 1,000 (over 4,000)	\$ 24.36
Rogue Creek Utilities***	Combo	W	March 1, 2014	W	\$ 23.06	\$3.89 per 1,000	\$ 42.51
Spokane Highlands	Water		May 1, 2015		\$ 14.67	\$4.22 per 1,000	\$ 35.77
Empire District Electric	Water		November 23, 2012		\$ 12.93	\$4.30 per 1,000	\$ 34.43
Holtgrewe Farms	Combo	W	January 5, 2011	W	\$ 15.10	\$4.66 per 1,000	\$ 38.40
Midland Water	Water		December 29, 2015		\$ 9.49	\$4.71 per 1,000	\$ 33.04
MAWC-St. Louis County	Combo	W	May 18, 2018	W	\$ 9.00	\$4.7814 per 1,000	\$ 32.91
MAWC-St. Louis County (Quarterly)	Combo	W	5/18/2018 (Quarterly)	W	\$ 27.00	\$4.7814 per 1,000	\$ 32.91
Lincoln County Sewer & Water-Bennington	Combo	W	July 20, 2012	W	\$ 23.34	\$5.33 per 1,000	\$ 49.99

RANKED WATER COMMODITY CHARGE

Stockton Hills	Water		July 24, 2017		\$ 16.86	\$5.34 per 1,000 (over 1,000)	\$ 38.22
Taney County Water	Water		December 29, 2015		\$ 12.55	\$5.63 per 1,000	\$ 40.70
Lakeland Heights Water	Water		December 14, 2012		\$ 15.50	\$5.63 per 1,000 (over 2,000)	\$ 32.39
Environmental Utilities	Water		January 20, 2018		\$ 29.86	\$5.81 per 1,000	\$ 58.91
Osage Water	Combo	W	September 19, 2009	W	\$ 24.76	\$5.86 per 1,000 (over 2,000)	\$ 42.34
Liberty Utilities-Holiday Hills	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
Liberty Utilities-Ozark Mountain	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
Liberty Utilities-Timber Creek	Water		April 7, 2002		\$ 8.96	\$5.96 per 1,000	\$ 38.76
MAWC-All Others	Combo	W	May 18, 2018	W	\$ 9.00	\$6.2469 per 1,000	\$ 40.23
Lincoln County Sewer & Water-Rockport	Combo	W	July 20, 2012	W	\$ 17.30	\$6.93 per 1,000	\$ 51.95
Raytown	Water		December 7, 2015		\$ 11.31	\$7.11 per 1,000	\$ 46.86
Hillcrest Utility Operating Company	Combo	W	August 19, 2016	W	\$ 40.48	\$7.35 per 1,000	\$ 77.23
Indian Hills	Water		March 23, 2018	Winter	\$ 50.90	\$7.70 per 1,000	\$ 58.60
Moore Bend Water	Water		December 29, 2015		\$ 28.13	\$10.31 per 1,000	\$ 79.68
Indian Hills	Water		March 23, 2018	Summer	\$ 50.90	11.55 per 1,000	\$ 62.45
MAWC-All Others	Combo	W	May 18, 2018	W	\$ 48.40	Flat Rate	\$ 48.40
Cedar Green Land Acquisition	Combo	W	August 1, 2013	W	\$ 26.79		\$ 26.79
Branson Cedars Resort	Combo	W	November 1, 2015	W	\$ 56.29		\$ 56.29

Ranked Sewer Commodity Charge

Name of Company	Type of Service		Date of Last Effective Tariff	Service Area	Customer Charge	Commodity Rate	Average Bill (Monthly)
Foxfire Utility Company	Combo	S	December 10, 2002	S	\$ 40.22	\$3.21 per 1,000 (over 2,000)	\$ 49.85
Seges	Combo	S	May 15, 2015	S	\$ 32.53	\$4.65 per 1,000	\$ 55.78
Taney County Utility	Sewer	S	May 17, 2004		\$ 7.19	\$4.90 per 1,000 (up to 8,000)	\$ 31.69
Canon Home Association	Sewer		June 3, 2016		\$ 33.56	\$6.99 per 1,000 (over 1,000)	\$ 61.52
Liberty Utilities-Timber Creek	Sewer		April 2, 2007		\$ 16.00	\$17.24 per 1,000	\$ 102.20
Liberty Utilities-Ozark Mountain	Sewer		April 2, 2007		\$ 16.00	\$17.24 per 1,000	\$ 102.20
Central Rivers Wastewater	Sewer		September 6, 2015		\$ 44.81		\$ 44.81
Missouri Utilities	Combo	S	August 10, 2009	S	\$ 8.80		\$ 8.80
Lake Northwoods Utility	Combo	S	May 21, 1984	S	\$ 9.51		\$ 9.51
MPB-Lake Virginia	Sewer		November 1, 2014		\$ 13.33		\$ 13.33
Willows Utility	Combo	S	April 1, 1995	S	\$ 15.00		\$ 15.00
Port Perry Service	Combo	S	May 15, 2002	S	\$ 18.94		\$ 18.94
Terre Du Lac Utilities	Combo	S	September 29, 2017	S	\$ 19.41		\$ 19.41
Highway H Utilities	Combo	S	January 15, 2010	S	\$ 19.72		\$ 19.72
Warren County	Sewer		December 31, 1999		\$ 22.11		\$ 22.11
MPB-Villa Ridge	Sewer		November 1, 2014		\$ 24.24		\$ 24.24
Liberty Utilities-Cape Rock Village	Sewer		February 1, 2011		\$ 27.60		\$ 27.60
Timber Creek-Clay County	Sewer		May 6, 2011		\$ 28.50		\$ 28.50
Osage Water	Combo	S	September 19, 2009	S	\$ 29.02		\$ 29.02
SK & M Water & Sewer	Combo	S	May 13, 2010	S	\$ 29.36		\$ 29.36
PCB	Sewer		November 1, 2014		\$ 29.75		\$ 29.75
EMC of St.Charles County	Sewer		April 4, 2008		\$ 30.00		\$ 30.00
TBJ-Bourbeuse	Sewer		September 2, 2011		\$ 30.05		\$ 30.05
Mill Creek Sewers	Sewer		October 12, 2005		\$ 30.11		\$ 30.11
North Oak Sewer District	Sewer		April 14, 2004		\$ 30.16		\$ 30.16
Lake Region Water & Sewer-Shawnee Bend	Combo	S	June 4, 2014	S	\$ 32.19		\$ 32.19
MAWC-Arnold	Sewer District A		May 18, 2018		\$ 32.64		\$ 32.64
Lake Region Water & Sewer-Horseshoe Bend	Combo	S	June 4, 2014	S	\$ 33.08		\$ 33.08
Calvey Brook	Combo	S	December 31, 2004	S	\$ 33.78		\$ 33.78
RD Sewer	Sewer		December 14, 2012		\$ 34.36		\$ 34.36
Roy-L Utilities	Combo	S	July 1, 2016	S	\$ 36.04		\$ 36.04
TBJ-Oak Hollow	Sewer		September 2, 2011		\$ 36.11		\$ 36.11
TBJ-St. John's	Sewer		September 2, 2011		\$ 36.59		\$ 36.59
Timber Creek-Platte County	Sewer		May 6, 2011		\$ 36.71		\$ 36.71
Gladlo Water & Sewer	Combo	S	May 18, 2017	S	\$ 37.67		\$ 37.67

Ranked Sewer Commodity Charge

Taneycomo Highlands	Sewer		July 7, 2006		\$ 38.00		\$ 38.00
MAWC Temple Terrace	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Anna Meadows	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Brooking Park	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Fenton	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Hickory Hills	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Jaxson Estates	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Maplewood	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Quail Run	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
MAWC-Westlake Village	Sewer District B		May 18, 2018		\$ 38.75		\$ 38.75
Holtgrewe Farms	Combo	S	January 5, 2011	S	\$ 39.25		\$ 39.25
Lincoln County Sewer & Water-Rockport		S	August 19, 2014		\$ 39.68		\$ 39.68
Valley Woods	Combo	S	December 29, 2015	S	\$ 42.16		\$ 42.16
Rogue Creek Utilities	Combo	S	March 1, 2014	S	\$ 44.16		\$ 44.16
Lincoln County Sewer & Water-Bennington	Combo	S	August 19, 2014		\$ 46.87		\$ 46.87
Cedar Green Land Acquisition	Combo	S	August 1, 2013	W	\$ 47.55		\$ 47.55
Branson Cedars Resort	Combo	S	November 1, 2015	S	\$ 48.26		\$ 48.26
MAWC-Benton County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Branson Canyon	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Callaway County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Cedar Hill	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Cole County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13

Ranked Sewer Commodity Charge

MAWC-Emerald Pointe	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Homestead Estates	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Incline Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Jefferson City	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Ozark Meadows	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Pevely Farms	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Platte County	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Radcliffe Estates	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Saddlebrooke Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Stonebridge Village	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
MAWC-Wardsville	Sewer District B		May 18, 2018		\$ 58.13		\$ 58.13
Mid-Mo Sanitation	Sewer		July 1, 2009		\$ 64.66		\$ 64.66
Raccoon Creek	Sewer		January 1, 2017		\$ 79.74		\$ 79.74
Hillcrest Utility Operating Company	Combo	S	August 19, 2016	S	\$ 83.56		\$ 83.56