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AUG 28 2015

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August 25, 2015

Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: File No. AW-2015-0282

Gentlemen:

This office is legal counsel to Utility Workers of America, AFL-CIO, Local 335 ("Local 335"). I am writing to communicate Local 335's position on the proposal of Missouri-American Water Company for a decoupling mechanism. Local 335 is concerned that any decoupling must provide that Missouri American Water adequately meet the costs associated with providing adequate service. Therefore, Local 335 supports decoupling as to Missouri-American Water conditioned upon the following:

1. Missouri American Water must be required to implement a valve maintenance and exercise program. Recent months have seen a number of main leaks due to faulty valves. In order to avoid such problems it is imperative that the valves be routinely exercised (opened and closed).
2. Steps must be taken to recruit, hire and train new employees to replace those retiring. Management has acknowledged the aging nature of the workforce. The CEO of Missouri American Water recently opined that 50% to 60% of the Workforce may retire within ten years. Having acknowledged this problem, the utility must bear the responsibility for addressing it.
3. Missouri American Water must fill vacancies as they occur. For too long vacancies have been allowed to persist, jeopardizing the Company's ability to operate efficiently.
 - a) In order to keep its four plants running, the Company needs at least 20 Senior Operators with Class A licenses. Two Senior Operators have left recently in order to obtain better pay and benefits elsewhere. The pool for Senior Operators comes from the category of Assistant Operators. While there are currently eight Assistant Operators, the Company has expressed its intent to shed this classification, especially at the North Plant, where there are four. The licensing process for plant operator's takes years.
 - b) The DLCC Operators coordinate pressure and pumps in St. Louis County and St. Charles. Recently, there were four DLCC Operators and two Relief

DLCC Operators. However, the Company has failed to fill a vacancy in the DLCC Operator classification due to a retirement.

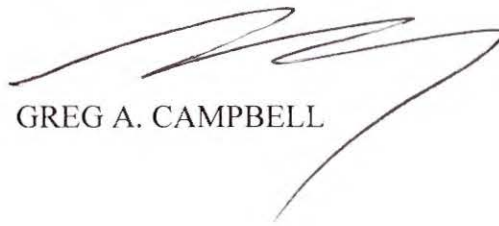
c) The Company's garage mechanics repair the Company's fleet vehicles. Previously, the Company had three shifts of garage mechanics. The Company recently eliminated two of these shifts leading to a loss of four positions. As a result, there is a backlog of work for this classification. For example, there are approximately 40 vehicles in need of safety inspections.

d) The number of meter readers has decreased from 24 to 17.

e) The Company's production plants have shop mechanic's that repair and maintain the pumps, motors and chemical feed equipment that keep the four plants running. There are currently nine shop mechanic positions that have gone unfilled.

The Company's failure to fill these and other vacancies have reduced the ability of the Company to properly serve its customers. Thus, as a condition for granting Missouri-American Water its requested relief, it should be required to fill the existing vacancies and maintain a proper level of staffing.

Very truly yours,

A handwritten signature in black ink, appearing to read 'GREG A. CAMPBELL', with a long, sweeping underline that extends to the right.

GREG A. CAMPBELL

GAC/jcb