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

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In the Matter of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas.

Case No. WR-2015-0301 Case No. SR-2015-0302

## MAWC'S MOTION TO MODIFY ORDER APPROVING NON-UNANIMOUS STIPULATION AND AGREEMENT

Comes now Missouri-American Water Company (MAWC or Company), and, as its Motion to Modify Order Approving Non-Unanimous Stipulation and Agreement, states as follows to the Missouri Public Service Commission (Commission):

1. On March 16, 2016, MAWC, the Staff of the Commission, the Office of the

Public Counsel, the Missouri Industrial Energy Consumers and the Missouri Division of Energy filed a Non-Unanimous Revenue Stipulation and Agreement resolving a number of issues, including agreement on an increase of \$30.6 million in the Company's annual revenue requirement on a total company basis (Revenue Requirement Stipulation).

2. On April 6, 2016, the Commission issued its Order Approving Non-Unanimous Stipulation and Agreement wherein, among other things, the Commission approved the Revenue Requirement Stipulation and directed the parties to abide by its terms.

3. Included in the revenue requirement increase were a variety of capital investments in utility plant. One of those was a Booster Station in the Joplin area. While that project was placed "in-service" prior to the true-up date in this matter, it has experienced an operational issue such that MAWC does not believe that it is currently used and useful.

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4. Therefore, MAWC believes that the revenue requirement increase to which it previously agreed, and which was approved by the Commission, should be decreased by an amount that approximates the revenue requirement associated with the Booster Station project (\$187,000). Accordingly, MAWC moves the Commission to modify its Order Approving Non-Unanimous Stipulation and Agreement and to approve only an increase of \$30.413 million in the Company's annual revenue requirement on a total company basis. All other aspects of the Non-Unanimous Revenue Stipulation and Agreement would remain unchanged.

5. Counsel for MAWC has discussed this matter with counsel for the Staff of the Commission, the Office of the Public Counsel, the Missouri Industrial Energy Consumers, and the Missouri Division of Energy, and counsel for those parties have stated that they have no objection to this motion.

WHEREFORE, MAWC respectfully requests that the Commission issue its order modifying its approval of the Revenue Requirement Stipulation to approve an increase of \$30.413 million in the Company's annual revenue requirement on a total company basis.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on April 25, 2016, to the parties.

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