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

In the matter of the Application/Petition of	)	
Missouri-American Water Company for	) File No. W	O-2016-0098
Approval to Reconcile its Infrastructure	)	
System Replacement Surcharge (ISRS).	)	

## MAWC'S RESPONSE TO ORDER DIRECTING FILING

**COMES NOW** Missouri-American Water Company (MAWC) and, in response to the Missouri Public Service Commission's (Commission) Order Directing Filing, states as follows:

- 1. On January 8, 2016, the Commission issued its Order Directing Filing wherein it directed that MAWC and the Commission's Staff (Staff) file a recommendation "regarding how they prefer to resolve that dispute between the parties."
- 2. Earlier on January 13, 2016, Staff filed its Staff Reply and Recommendation. Included in that document was the following paragraph:

In the alternative, as the Parties disagree on the total ISRS reconciliation amount, Staff recommends the Commission stay such determination until MAWC's next ISRS filing, subsequent to its pending rate case. As MAWC did not file any tariffs to adjust its ISRS rates to compensate for its under-collection, there are no pressing issues subject to the Commission's determination of reconciliation totals. As such, the reconciliation total will be carried over and addressed in MAWC's next ISRS and tariff filing, consistent with Commission Rule 4 CSR 240-3.650(17) and prior applied practice.

3. MAWC agrees that a determination of the under recovery at this point in time would have no import. As explained in MAWC's Response to Staff Recommendation and OPC Motion to Dismiss, filed on January 7, 2016, MAWC made this filing to comply with Commission Rule 4 CSR 240-3.650(16). However, regardless of the amount of under recovery at this point in time, MAWC is not in a position to change its ISRS rate. Under recovery may have import in MAWC's first ISRS filing after the conclusion of its pending rate case (WR-

2015-0301). However, by that time, the under recovery will change, whether MAWC or Staff's methodology is used.

4. Accordingly, MAWC suggests that MAWC has met its requirement to file the reconciliation called for by Commission Rule 4 CSR 240-3.650(16), and thereafter close this case as requiring no further action.

**WHEREFORE**, MAWC respectfully requests that the Commission consider this response to comply with its Order Directing Filing.

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 or by U.S. Mail, postage prepaid, on January 13, 2016, to the following:

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