

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

In the Matter of the Application of)	
the Application of a Rate Increase of)	
Raytown Water Company)	Case No. WR-2023-0344
)	
)	
)	

**OFFICE OF THE PUBLIC COUNSEL PLEADING AND
REQUEST FOR AN EVIDENTIARY HEARING**

COMES NOW the Office of the Public Counsel (“OPC”) and for its opposition to the Non-Unanimous Disposition Agreement and request for an evidentiary hearing, states:

1. On April 4, 2023, Raytown Water Company (“RWC,” “Raytown,” or “Company”) sent the Public Service Commission (“Commission”) a letter requesting a \$735,102.73, or 14.20%, increase in annual operating revenue.

2. After conducting an audit and investigation, Public Service Commission Staff (“Staff”) and Raytown filed a Non-Unanimous Disposition Agreement (“Agreement”) with supporting documentation.

3. In conducting its own investigation, the OPC discovered several questions and concerns regarding the Company’s rate increase request and Staff’s subsequent investigation.

4. The questions and concerns the OPC’s audit and investigation of RWC uncovered centered around the following issues:

- a. The stark difference between the initial rate increase amount that the Company proposed, and the rate increase amount that Staff and RWC agreed to;
- b. The Company's decision to install AMI, the capabilities available with the chosen AMI; and the process by which they chose the AMI provider;
- c. The numerous negligence lawsuits RWC has lost in the past few years, how those lawsuits have effected insurance premiums, and how the Company is handling payment for those insurance premiums;
- d. Raytown's use of customer fees to increase company revenues;
- e. The Company's choice to drastically increase the amount of money its employees are paid, as well as the employees' classifications as either hourly or salaried;
- f. Raytown's Cost of Capital;
- g. RWC's use and handling of non-regulated affiliates;
- h. The Company's customer service capabilities, including issues around its website and the Customer Service call line;
- i. The Agreement's silence around the depreciation reserve;
- j. The substantial increase and lack of certainty around the company's actual operation and maintenance (O&M) expenses; and

k. The Company's management practices and the need for a management audit.

5. The OPC reserves the right to include other concerns, as they arise.

6. Due to the expedited timeline of the case, the OPC would like to shorten the time period the parties have to respond to data requests to ten (10) days.

7. Further, the OPC respectfully requests an evidentiary hearing around Raytown's request for a rate increase following the attached, or a substantially similar, proposed procedural schedule.

WHEREFORE, the Office of the Public Counsel respectfully requests that the Commission adopt the attached proposed procedural schedule, if not a schedule with a similar timeline.

Respectfully submitted,

/s/ Anna Martin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 19th day of September, 2023.

/s/ Anna Martin