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

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In the Matter of the Petition of Missouri-American Water Company for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA).

File Nos. <u>WO-2023-0427</u>

## **RESPONSE TO STAFF RECOMMENDATION**

**COMES NOW** Missouri-American Water Company ("MAWC") and as its *Response to Staff Recommendation* respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. On September 1, 2023, MAWC filed its *Petition to Establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) and Motion for Approval of Customer Notice* ("Petition") pursuant to the provisions of the Missouri Water and Sewer Infrastructure Act, Sections 393.1500 and 393.1509, RSMo., and Commission Rule 20 CSR 4240-2.060(1). The WSIRA Petition was filed based the actual WSIRA eligible investment placed in service for the period January 1, 2022, to July 31, 2023, with estimated WSIRA costs for August 1, 2023, through October 31, 2023, also included. MAWC supplied the actual WSIRA investments for August 1, 2023, through October 31, 2023, during the course of this case.

2. November 29, 2023, the Staff of the Commission ("Staff") filed its *Staff Recommendation* concerning the Petition. That recommendation was later amended on November 29, 2023, and November 30, 2023.

3. MAWC has reviewed the *Staff Recommendation*, as amended, and agrees with Staff's recommended WSIRA revenues of \$23,286,383 from St. Louis County water customers, \$3,289,514 from All Other water customers, \$8,428 from Arnold sewer customers, and \$95,565 from All Other sewer customers for a total in this filing of \$26,679,890.

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4. Accordingly, attached as <u>Appendix A and B</u> are exemplar tariff sheets that MAWC would file and seek approval of as a result of the revenue requirements identified in the

Staff Recommendation.

WHEREFORE, MAWC respectfully submits this *Response to Staff Recommendation* and requests that the Commission issue an order approving the WSIRA revenues for MAWC as described herein.

Respectfully submitted,

Q1.Com

Dean L. Cooper MBE #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue P. O. Box 456 Jefferson City, MO 65102 (573) 635-7166 dcooper@brydonlaw.com

Timothy W. Luft, MBE #40506 Corporate Counsel MISSOURI-AMERICAN WATER COMPANY 727 Craig Road St. Louis, MO 63141 (314) 996-2279 telephone timothy.luft@amwater.com

Rachel L. Niemeier, MBE #56073 Corporate Counsel MISSOURI-AMERICAN WATER COMPANY 727 Craig Road St. Louis, MO 63141 (314) 996-2390 telephone rachel.niemeier@amwater.com

# ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

# **CERTIFICATE OF SERVICE**

l hereby certify that a copy of the above and foregoing document was sent via electronic mail on this 11<sup>th</sup> day of December 2023, to all counsel of record.

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#### **APPENDIX A** Page 1 of 2

FORM NO. 13	P.S.C MO NO. 13	7 <sup>th</sup> Revised Sheet No. <u>RT 11.1</u> Cancelling 6 <sup>th</sup> Revised Sheet No. <u>RT 11.1</u>
Missouri-American Water Company	For	St. Louis County
Name of Issuing Corporation		Community, Town or City

Name of Issuing Corporation		Community, Towr	or City
	Rate W		
Water & Sewer In	frastructure Replacemen	t Surcharge (WSIRA)	
<b>DESCRIPTION</b> - Rate W is designed to recover of 1) Replacement of or cleaning and relining of e curbstops and manholes, 2) Replacement of le meters, 3) Replacement of booster station and as well as related pipes, valves and meters, 4) a highway, road, street, public way, or other pu- subdivision of this state, or another entity havin such projects have not been reimbursed to the wastewater treatment mechanical equipment intake pumps, transfer pumps, high service or of Supervisory Control and Data Acquisition Syste of remote installations including radio and cellor The WSIRA rate is calculated and implemented RSMO. Any future changes to this rate will also	existing mains, hydrants, r ad mains, goosenecks, lea I lift station pumps, with e Facilities relocations requinable ublic work by or on behalf ing the power of eminent water or sewer corporation with equipment of similar discharge pumps, and me ms (SCADA) components ular communication equip in accordance with the particular	neters, service lines, laterals, sewer taps, id service lines and associated valves and equipment of similar capacity and operation ired due to construction or improvement of of the United States, this state, a political domain; provided that the costs related to on; 5) Replacement of water and capacity and operation, including well and tering pumps, 6) Replacement of necessary for the operation and monitoring ment, and programmable logic controllers. rovisions of sections 393.1500 to 393.1509	
APPLICABILITY - This rate is applicable to any comprojects eligible for WSIRA recovery. The surch service study recognized by the Missouri Commentation of the other of charge for the WSIRA will apply for service rendered and the the the the the service service rendered and the	harge is calculated consist hission in the Company's r charges provided for in th	ent with the customer class cost-of- nost recent general rate proceeding. e Company's tariffs, a separate	
Customer Rate Class	Rate per 100 Gallons	Rate per 1,000 Gallons	
Rate A	\$0.07032	\$0.70316	*
Rate B	\$0.02164	\$0.21642	*

**RULES AND REGULATIONS** – The General Rules and Regulations set forth in this tariff shall govern the supply of service under this rate.

Rate J

\$0.01525

\$0.15249

PAYMENT TERMS - All bills for service under this schedule will be rendered in arrears on a monthly or quarterly basis. The due date on the tariff shall be ten (10) days after the "date of rendition" of the bill to the customer. The customer's bill will be due and payable after this due date. The delinquent date printed on the bill will not be less than twenty-one (21) days after the date of the postmark of the bill. Any accounts remaining unpaid at the expiration of twenty-one (21) days shall be considered delinquent and the Company may take such action as specified in its filed rules and regulations.

TAXES - These rates do not include any municipal, state or federal taxes computed on either billing or consumption basis. Any such taxes applicable shall be added as separate items in rendering each bill.

Indicates new rate or text

+	<i>Indicates change</i> Date of Issue:	December XX, 2023	Effective Date:	January XX, 2024
	Issued By:	<u>Rich C. Svindland, Presider</u> 727 Craig Road, St. Louis, N	_	

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7<sup>th</sup> Revised Sheet No. <u>RT 11.2</u> Cancelling 6<sup>th</sup> Revised Sheet No. <u>RT 11.2</u>

Missouri-American Water Company Name of Issuing Corporation

# All Missouri Service Areas Outside of St. Louis County

Community,	Town	or City
Community,		

Rate W

## Water & Sewer Infrastructure Replacement Surcharge (WSIRA)

**DESCRIPTION** - Rate W is designed to recover costs associated with the Company's eligible infrastructure projects: 1) Replacement of or cleaning and relining of existing mains, hydrants, meters, service lines, laterals, sewer taps, curbstops and manholes, 2) Replacement of lead mains, goosenecks, lead service lines and associated valves and meters, 3) Replacement of booster station and lift station pumps, with equipment of similar capacity and operation, as well as related pipes, valves and meters, 4) Facilities relocations required due to construction or improvement of a highway, road, street, public way, or other public work by or on behalf of the United States, this state, a political subdivision of this state, or another entity having the power of eminent domain; provided that the costs related to such projects have not been reimbursed to the water or sewer corporation; 5) Replacement of water and wastewater treatment mechanical equipment with equipment of similar capacity and operation, including well and intake pumps, transfer pumps, high service or discharge pumps, and metering pumps, 6) Replacement of Supervisory Control and Data Acquisition Systems (SCADA) components necessary for the operation and monitoring of remote installations including radio and cellular communication equipment, and programmable logic controllers. The WSIRA rate is calculated and implemented in accordance with the provisions of sections 393.1500 to 393.1509 RSMO. Any future changes to this rate will also be made in accordance with those provisions.

<u>APPLICABILITY</u> - This rate is applicable to any customer class who benefits from the subject utility plant projects eligible for WSIRA recovery. The surcharge is calculated consistent with the customer class cost-of-service study recognized by the Missouri Commission in the Company's most recent general rate proceeding.

**<u>RATE COMPONENTS</u>** - In addition to the other charges provided for in the Company's tariffs, a separate charge for the WSIRA will apply for service rendered on and after the effective date.

Customer Rate Class	Rate per 100 Gallons	Rate per 1,000 Gallons	
Rate A	\$0.03207	\$0.32074	*
Rate B	\$0.00823	\$0.08234	*
Rate J	\$0.01057	\$0.10575	*

**<u>RULES AND REGULATIONS</u>** – The General Rules and Regulations set forth in this tariff shall govern the supply of service under this rate.

**PAYMENT TERMS** - All bills for service under this schedule will be rendered in arrears on a monthly or quarterly basis. The due date on the tariff shall be ten (10) days after the "date of rendition" of the bill to the customer. The customer's bill will be due and payable after this due date. The delinquent date printed on the bill will not be less than twenty-one (21) days after the date of the postmark of the bill. Any accounts remaining unpaid at the expiration of twenty-one (21) days shall be considered delinquent and the Company may take such action as specified in its filed rules and regulations.

**TAXES** - These rates do not include any municipal, state or federal taxes computed on either billing or consumption basis. Any such taxes applicable shall be added as separate items in rendering each bill.

\* Indicates new rate or text

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	Issued By:	Rich C. Svindland, Preside	ant		
	issueu by.	Metre: Swindland, Fresident			
		727 Craig Road, St. Louis,	MO 63141		

For

P.S.C MO NO. 13

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Page	1	of 2	

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FORM NO. 13	P.S.C MO NO. 26	6 <sup>th</sup> Revised Sheet No. <u>RT 11.1</u>
		Cancelling 5 <sup>th</sup> Revised Sheet No. <u>RT 11.1</u>
Missouri-American Water Company	For	City of Arnold and Surrounding Area
Name of Issuing Corporation		Community, Town or City

Rate W Water & Sewer Infrastructure Replacement Surcharge (WSIRA)

**DESCRIPTION** - Rate W is designed to recover costs associated with the Company's eligible infrastructure projects: 1) Replacement of or cleaning and relining of existing mains, hydrants, meters, service lines, laterals, sewer taps, curbstops and manholes, 2) Replacement of lead mains, goosenecks, lead service lines and associated valves and meters, 3) Replacement of booster station and lift station pumps, with equipment of similar capacity and operation, as well as related pipes, valves and meters, 4) Facilities relocations required due to construction or improvement of a highway, road, street, public way, or other public work by or on behalf of the United States, this state, a political subdivision of this state, or another entity having the power of eminent domain; provided that the costs related to such projects have not been reimbursed to the water or sewer corporation; 5) Replacement of water and wastewater treatment mechanical equipment with equipment of similar capacity and operation, including well and intake pumps, transfer pumps, high service or discharge pumps, and metering pumps, 6) Replacement of Supervisory Control and Data Acquisition Systems (SCADA) components necessary for the operation and monitoring of remote installations including radio and cellular communication equipment, and programmable logic controllers. The WSIRA rate is calculated and implemented in accordance with the provisions of sections 393.1500 to 393.1509 RSMO. Any future changes to this rate will also be made in accordance with those provisions.

**APPLICABILITY** - This rate is applicable to any customer class who benefits from the subject utility plant projects eligible for WSIRA recovery. The surcharge is calculated consistent with the customer class cost-ofservice study recognized by the Missouri Commission in the Company's most recent general rate proceeding.

**RATE COMPONENTS** - In addition to the other charges provided for in the Company's tariffs, a separate charge for the WSIRA will apply for service rendered on and after the effective date. The WSIRA charge is calculated as a percentage of the customer's total bill, prior to any taxes.

> All Customers: 0.1269% of the total bill

**RULES AND REGULATIONS** – The General Rules and Regulations set forth in this tariff shall govern the supply of service under this rate.

**PAYMENT TERMS** - All bills for service under this schedule will be rendered in arrears on a monthly or guarterly basis. The due date on the tariff shall be ten (10) days after the "date of rendition" of the bill to the customer. The customer's bill will be due and payable after this due date. The delinquent date printed on the bill will not be less than twenty-one (21) days after the date of the postmark of the bill. Any accounts remaining unpaid at the expiration of twenty-one (21) days shall be considered delinquent and the Company may take such action as specified in its filed rules and regulations.

TAXES - These rates do not include any municipal, state or federal taxes computed on either billing or consumption basis. Any such taxes applicable shall be added as separate items in rendering each bill.

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	Issued By:	Rich C. Svindland, Presiden	<u>t</u>	

727 Craig Road, St. Louis, MO 63141

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Page	2	of 2	

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FORM NO. 13	P.S.C MO NO. 26	6 <sup>th</sup> Revised Sheet No. <u>RT 11.2</u>
		Cancelling 5 <sup>th</sup> Revised Sheet No. <u>RT 11.2</u>
Missouri-American Water Company	For	All Missouri Service Areas Outside of City of Arnold
Name of Issuing Corporation	_	Community, Town or City

Rate W Water & Sewer Infrastructure Replacement Surcharge (WSIRA)

**DESCRIPTION** - Rate W is designed to recover costs associated with the Company's eligible infrastructure projects: 1) Replacement of or cleaning and relining of existing mains, hydrants, meters, service lines, laterals, sewer taps, curbstops and manholes, 2) Replacement of lead mains, goosenecks, lead service lines and associated valves and meters, 3) Replacement of booster station and lift station pumps, with equipment of similar capacity and operation, as well as related pipes, valves and meters, 4) Facilities relocations required due to construction or improvement of a highway, road, street, public way, or other public work by or on behalf of the United States, this state, a political subdivision of this state, or another entity having the power of eminent domain; provided that the costs related to such projects have not been reimbursed to the water or sewer corporation; 5) Replacement of water and wastewater treatment mechanical equipment with equipment of similar capacity and operation, including well and intake pumps, transfer pumps, high service or discharge pumps, and metering pumps, 6) Replacement of Supervisory Control and Data Acquisition Systems (SCADA) components necessary for the operation and monitoring of remote installations including radio and cellular communication equipment, and programmable logic controllers. The WSIRA rate is calculated and implemented in accordance with the provisions of sections 393.1500 to 393.1509 RSMO. Any future changes to this rate will also be made in accordance with those provisions.

**APPLICABILITY** - This rate is applicable to any customer class who benefits from the subject utility plant projects eligible for WSIRA recovery. The surcharge is calculated consistent with the customer class cost-ofservice study recognized by the Missouri Commission in the Company's most recent general rate proceeding.

**RATE COMPONENTS** - In addition to the other charges provided for in the Company's tariffs, a separate charge for the WSIRA will apply for service rendered on and after the effective date. The WSIRA charge is calculated as a percentage of the customer's total bill, prior to any taxes.

> All Customers: 0.7585% of the total bill

**RULES AND REGULATIONS** – The General Rules and Regulations set forth in this tariff shall govern the supply of service under this rate.

**PAYMENT TERMS** - All bills for service under this schedule will be rendered in arrears on a monthly or guarterly basis. The due date on the tariff shall be ten (10) days after the "date of rendition" of the bill to the customer. The customer's bill will be due and payable after this due date. The delinquent date printed on the bill will not be less than twenty-one (21) days after the date of the postmark of the bill. Any accounts remaining unpaid at the expiration of twenty-one (21) days shall be considered delinquent and the Company may take such action as specified in its filed rules and regulations.

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