BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of a Rate) File No. WR-2023-0344 Increase of Raytown Water Company.) JW-2024-0113

MOTION FOR EXPEDITED TREATMENT AND APPROVAL OF COMPLIANCE TARIFFS

COMES NOW The Raytown Water Company ("RWC" or the "Company"), by and through counsel, and for its Motion for Expedited Treatment pursuant to 20 CSR 4240-2.080(14) and its request for approval of its water and sewer tariff sheets being submitted pursuant to the *Report and Order* issued herein on January 18, 2024 (effective January 29, 2024), respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. The Commission's *Report and Order* authorized RWC "to file tariff sheets sufficient to recover revenues approved in compliance with this order." (Report and Order, p. 83)

2. On this date, RWC has caused to be filed with the Commission water tariff sheets designed to effectuate the decisions made by the Commission in its *Report and Order (Tracking Number JW-2024-0113)*. RWC' compliance water tariff sheets bear an issue date of February 16, 2024, and a proposed effective date of March 17, 2024 (thirty days thereafter).

3. Although Section 393.140(11), RSMo, indicates that thirty days' notice is generally required, Section 393.140(11) specifically provides that, for good cause shown, the Commission may allow tariff sheets to become effective on less than thirty days' notice. RWC believes that a full thirty days between issue and effective date is not necessary in this case. This case was initiated on April 4, 2023, with RWC's submission of a rate increase notice. On September 14, 2023, the Company submitted tariff sheets in conjunction with a non-unanimous disposition agreement. The Commission thereafter suspended those tariff sheets until January

29, 2024. Since RWC's original notice filing, the parties have conducted discovery, filed prepared testimony, and conducted an evidentiary hearing concerning matters in dispute. The Commission further conducted a local hearing.

4. Good cause for allowing these revised tariffs to become effective on less than thirty days' notice is shown by the following: (a) the tariff sheets are being filed in compliance with the Commission's *Report and Order*; (b) the Commission and the public have been aware of RWC's request for a rate increase for over ten months; (c) the Commission and the parties, through the rate case process, have been able to consider all aspects of the Company's request and the possible impact of a rate increase; and, (d) tariffs originally filed by RWC were suspended only until January 29, 2024. Accordingly, the Company requests that the tariff sheets be allowed to go into effect on less than thirty days' notice on March 4, 2024.

5. With the issuance of its *Report and Order*, the Commission determined that revised rate schedules should be filed by RWC and that the revised rates are just and reasonable. As such, pursuant to 20 CSR 4240-2.080(14)(B), RWC states that the harm from the continuation of the current rates will be avoided and the benefits from the agreements of the parties and orders of the Commission will accrue if this motion is granted, and that the granting of this motion will not have a negative effect on RWC customers or the public in general.

6. RWC states that this motion is being filed as soon as the subject tariff sheets could be prepared, and, pursuant to Commission Rule 20 CSR 4240-2.080(14)(A), requests that the Commission act on this motion as soon as possible and issue its order approving RWC's compliance tariffs to take effect on March 4, 2024, or as soon thereafter as is practicable.

WHEREFORE, RWC respectfully requests that the Commission issue an order approving the Company's compliance tariff sheets (*Tracking Number JW-2024-0113*) on less

than thirty days' notice (on March 4, 2024, or as soon thereafter as is practicable) and grant such other and further relief as the Commission deems necessary or appropriate.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

la-By:

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ATTORNEYS FOR THE RAYTOWN WATER COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 16th day of February, 2024, to:

General Counsel's Office staffcounselservice@psc.mo.gov casi.aslin@psc.mo.gov Office of the Public Counsel <u>opcservice@opc.mo.gov</u> <u>Anna.Martin@psc.mo.gov</u>

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