

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

In the Matter of Missouri-American Water                    )  
Company's Request for Authority to Implement a            )            Case No. WR-2024-0320  
General Rate Increase for Water and Sewer                )  
Service Provided in Missouri Service Areas.                )

**MOTION FOR LEAVE TO SUPPLEMENT THE  
DIRECT TESTIMONY OF BRIAN W. LAGRAN**

Comes now Missouri-American Water Company (MAWC or Company), and, as its *Motion for Leave to Supplement the Direct Testimony of Brian W. LaGrand*, states as follows to the Missouri Public Service Commission (Commission):

1. MAWC has filed with the Commission tariff sheets and direct testimony seeking a general rate increase for both its water and sewer operations.

2. Concurrently with the filing of the tariff sheets and direct testimony, MAWC filed a *Motion to Establish Future Test Year*. The revenue requirement identified in the Direct Testimony of MAWC witness Brian W. LaGrand was based on the use of a future test year.

3. On July 31, 2024, the Commission issued its *Order Regarding Test Year*. Therein, the Commission concluded that the historic test year with adjustments should be adopted. The historic test year and adjustments were described as follows in Ordered Paragraph 1:

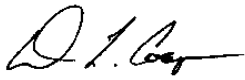
The parties shall use a test year of the 12 months ending December 31, 2023 and a true-up period of the 12 months ending December, 31, 2024. The true-up process and hearing will be for the sole purpose of updating various known and measurable cost of service components to December 31, 2024. Additionally, all the parties may propose specific (discrete) adjustments to the December 31, 2024 known and measurable revenue requirement calculation.

4. The Commission further directed that MAWC “shall submit a historical test year revenue requirement, updated with historical results in accordance with the requirements of Ordered Paragraph 1.”

5. Accordingly, MAWC requests leave of the Commission to file the attached *Supplemental Direct Testimony of Brian W. LaGrand*. Mr. LaGrand's *Supplemental Direct Testimony* modifies MAWC's revenue requirement request to conform to the requirements of Ordered Paragraph 1; further identifies the Company's proposed specific (discrete) adjustments, as based primarily upon information found in the workpapers to which parties have previously been granted access; and incorporate corrections for errors discovered by the Company. MAWC believes that supplementing Mr. LaGrand's Direct Testimony in this fashion will provide other parties with an opportunity to review and respond to the Company's specific calculations and proposed adjustments. Additionally, MAWC intends to update the historical test year/true-up period revenue requirement with historical results and update the proposed discrete adjustments at the time it provides true-up data in this case.<sup>1</sup>

**WHEREFORE**, MAWC prays the Commission issue its order granting MAWC leave to file the attached *Supplemental Direct Testimony of Brian W. LaGrand*.

Respectfully submitted,

 _____ Dean L. Cooper, MBE #36592 <b>BRYDON, SWEARENGEN &amp; ENGLAND P.C.</b> 312 E. Capitol Avenue P.O. Box 456 Jefferson City, MO 65012 (573) 635-7166 telephone <a href="mailto:dcooper@brydonlaw.com">dcooper@brydonlaw.com</a>	Timothy W. Luft, Mo Bar #40506 Rachel L. Niemeier, Mo. Bar #56073 Corporate Counsel MISSOURI-AMERICAN WATER COMPANY 727 Craig Road St. Louis, MO 63141 (314) 996-2279 (Tim) (313) 996-2390 (Rachel) <a href="mailto:Timothy.Luft@amwater.com">Timothy.Luft@amwater.com</a> <a href="mailto:Rachel.Niemeier@amwater.com">Rachel.Niemeier@amwater.com</a>
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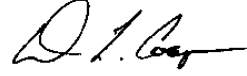
**ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY**

<sup>1</sup> This could include acquisitions or sales of utility plant depending on circumstances at that time.



**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record this 6<sup>th</sup> day of September 2024.



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