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 Change a Water and Sewer Infrastructure Rate Adjustment ("WSIRA") File No. WR-2025-0009 Tariff No. JW-2025-0026 File No. SR-2025-0010 Tariff No. JS-2025-0027

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and hereby submits its Staff Recommendation and Memorandum in this matter, stating:

1. Sections 393.1500-1509, RSMo, provide that eligible water and sewer corporations may recover certain infrastructure system replacement costs through a Water and Sewer Infrastructure Rate Adjustment ("WSIRA"). Pursuant to Commission Rule 20 CSR 4240-4.017, Missouri-American Water Company ("MAWC") filed its 60-day notice on July 3, 2024.

2. On September 3, 2024, MAWC filed its *Petition to Change a Water* and Sewer Infrastructure Rate Adjustment (WSIRA) ("Petition") with the Missouri Public Service Commission ("Commission"). Attached to MAWC's *Petition* were Appendices A - L. MAWC also filed tariff sheets in the tariff tracking files, JW-2025-0026 and JS-2025-0027.

3. On September 12, 2024, the Commission entered an Order Directing Notice, Setting an Intervention Deadline, Directing a Staff Recommendation, and Consolidating Files. This Order granted MAWC's Motion to Consolidate WSIRA cases WR-2025-0009 (water) and SR-2025-0010 (sewer), ordered Staff to file its recommendation no later than December 2, 2024, and ordered MAWC to respond to

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Staff's recommendation no later than December 9, 2024. No parties requested intervention.

4. On September 19, 2024, the Commission entered an *Order Suspending Tariff*, which suspended the tariff sheets filed by MAWC on September 3, 2024, (tracking numbers JW-2025-0026 and JS-2025-0027) until March 2, 2025.

5. MAWC submitted its *Petition* to recover WSIRA investment that was placed into service for the period May 1, 2024, to July 31, 2024, with estimated WSIRA costs for August 1, 2024, through October 31, 2024, also included. MAWC estimated in its Petition that it was entitled to WSIRA water revenues of \$19,260,452 and sewer revenues of \$154,816. This would equate to an increase of approximately 4.6% for water and 0.8% for sewer based on the base revenue level approved by the Commission in its most recent rate case. The WSIRA proposal also includes an estimated adjustment of (\$1,120,219) to reflect an over-collection from previously authorized WSIRA sewer revenues.

6. Based upon its investigation and calculations, Staff concludes that MAWC's actual WSIRA rates should be designed to recover annual WSIRA revenues of \$12,585,444 from St. Louis County water customers, \$3,047,411 from All Other water customers, \$9,783 from Arnold sewer customers, and \$194,719 from All Other sewer customers for a total of \$15,837,357.

7. Staff's calculations reflect the overall pre-tax weighted average cost of capital of 8.65% (tax grossed up rate of return) and MAWC's current depreciation rates, as reflected in the *Stipulation and Agreement* approved and ordered by the Commission on May 3, 2023, in Case No. WR-2022-0303, MAWC's last general rate case.

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8. Staff based its conclusions on an examination of work orders and supporting documentation for the projects included for recovery in MAWC's proposed WSIRA filing, as well as from a review of the *Stipulation and Agreement* in Case No. WR-2022-0303. Staff agrees with the methodology utilized by MAWC in the calculation of the WSIRA revenue requirement for the purpose of this WSIRA filing. In its calculation of the WSIRA revenue requirement Staff utilized the replacement of estimated costs included in the WSIRA plant balances included in the Company's direct filing with the actual cost for that period.

9. MAWC is current on its quarterly assessment payments and is not delinquent for prior year's assessments, nor does MAWC have any past due annual reports.

WHEREFORE, for the reasons stated above and in Staff's attached Memorandum, incorporated herein, Staff recommends that the Commission issue an order in this case that:

- 1) Rejects the following proposed tariff sheets filed in Tariff No. JW-2025-0026:
 - a. FORM NO. 13 P.S.C. MO NO. 13 9th Revised Sheet No. RT 11.1 Cancelling 8th Revised Sheet No. RT 11.1; and
 - b. FORM NO. 13. P.S.C. MO No. 13 9th Revised Sheet No. RT 11.2
 Cancelling 8th Revised Sheet No. RT 11.2;
- 2) Rejects the following proposed tariff sheets filed in Tariff No. JS-2025-0027:
 - a. FORM NO. 13 P.S.C. MO NO. 26 8th Revised Sheet No. RT 11.1 Cancelling 7th Revised Sheet No. RT 11.1; and

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b. FORM NO. 13. P.S.C. MO No. 26 8th Revised Sheet No. RT 11.2
 Cancelling 7th Revised Sheet No. RT 11.2;

3) Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$12,585,444 from St. Louis County water customers, \$3,047,411 from All Other water customers, \$9,783 from Arnold sewer customers, and \$194,719 from All Other sewer customers for a total in this filing of \$15,837,357; and

4) Authorizes MAWC to file revised tariff sheets for each utility, service area, and customer class, as reflected in Staff's Appendix A1 – A4, which generates \$15,837,357.

Respectfully submitted,

<u>/s/ Carolyn H. Kerr</u>

Missouri Bar Number Missouri Bar No. 45718 Senior Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 573-751-5397 (Voice) 573-526-6969 (Fax) Carolyn.kerr@psc.mo.gov

Attorney for Staff of the Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and or counsel of record on this 2nd day of December, 2024.

s/ Carolyn H. Kerr

MEMORANDUM

TO:	Missouri Public Service Commission Official Case File Case No. WR-2025-0009, Tariff No. JW-2025-0026 and JS-2025-0027
FROM:	Keri Roth, Water, Sewer, Gas, & Steam Department
	/s/ Keri Roth12/02/2024Lead Senior Utility Regulatory AuditorDate
SUBJECT:	Staff Report and Recommendation Regarding the Petition of Missouri-American Water Company for Approval to Establish a Water and Sewer Infrastructure Adjustment ("WSIRA")

DATE: December 2, 2024

BACKGROUND

On September 3, 2024, Missouri-American Water Company ("Company" or "MAWC") filed its *Petition to Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA)* ("Petition") with the Missouri Public Service Commission ("Commission"). The Company submitted its Petition pursuant to the provisions of the Missouri Water and Sewer Infrastructure Act, Sections 393.1500 to 393.1509, RSMo, and Commission Rule 20 CSR 4240-2.060(1). These sections provide that eligible water and sewer corporations may recover certain infrastructure system replacement costs without the need to file a formal rate case. Instead, these investments in infrastructure are recovered through a Water and Sewer Infrastructure Rate Adjustment ("WSIRA"). This is MAWC's third WSIRA filing since its most recently completed general rate case, Case No. WR-2022-0303; however, MAWC filed a new general rate case under Case No. WR-2024-0320. Additionally, this is MAWC's sixth WSIRA filing under the enabling statutes cited above.¹

In this case (WR-2025-0009), MAWC submitted its Petition to recover WSIRA investment that was placed into service for the period May 1, 2024, to July 31, 2024, with estimated WSIRA costs for August 1, 2024, through October 31, 2024, also included. MAWC estimated in its Petition that it was entitled in this case to WSIRA water revenues of \$19,260,452 and sewer revenues of \$154,816. This would equate to an increase of approximately 4.6% for water and 0.8% for sewer, based on the base revenue level approved by the Commission in its most recently completed general rate case. During the normal course of a WSIRA case, the revenues are expected to increase or decrease as the estimated values are updated, as described below.

On September 12, 2024, the Commission issued its Order Directing Notice, Setting an Intervention Deadline, Directing a Staff Recommendation, and Consolidating Files, establishing September 27,

¹ MAWC's previous WSIRA filings are Case Nos. WO-2021-0428, WO-2022-0176, WO-2023-0008, WO-2023-0427, and WO-2024-0195.

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2024, as the deadline to intervene in the instant case. As of the date of Staff's Recommendation, no parties have requested to intervene in this case. On September 19, 2024, the Commission issued its *Order Suspending Tariff*. The Commission directed Staff to file a report regarding its recommendation of the WSIRA filing no later than December 2, 2024. The Commission ordered MAWC to respond to Staff's recommendation no later than December 9, 2024.

In the course of processing the Petition, the Company updated its numbers and Staff calculated the new WSIRA rates. As is routine in this type of proceeding, the Company will need to submit new proposed tariff sheets that reflect its updated calculations and proposed WSIRA rates. The tariff sheets MAWC filed in this docket have an issue date of September 3, 2024, and an effective date of October 3, 2024. If the Commission approves new WSIRA rates, MAWC will need to submit new tariff sheets which include revised issue and effective dates. MAWC's most recent WSIRA tariff sheets approved by the Commission, in Case No. WO-2024-0195, were issued June 20, 2024, and became effective July 11, 2024.

STAFF INVESTIGATION

The Missouri Water and Sewer Infrastructure Act, Section 393.1506, RSMo, states:

A water or sewer corporation that provides water or sewer service to more than eight thousand customer connections may file a petition and proposed rate schedules with the commission to establish or change a WSIRA that will provide for the recovery of the appropriate pretax revenues associated with the eligible infrastructure system projects, less the appropriate pretax revenues associated with any retired utility plant that is being replaced by the eligible infrastructure system projects. The WSIRA shall not produce revenues in excess of fifteen percent of the water or sewer corporation's base revenue requirement approved by the commission in the water or sewer corporation's most recent general rate proceeding; provided, however, that neither WSIRA revenues attributable to replacement of customer-owned lead service lines, nor any reconciliation amounts described in subdivision (2) of subsection 5 of section 393.1509, shall count toward the program cap.

As noted in its Petition, MAWC serves approximately 484,000 water customers and 24,000 sewer customers, thereby meeting the WSIRA filing criteria of a corporation providing water or sewer service to more than 8,000 customer connections. In addition, the cumulative amount of WSIRA revenues that will result from this Petition does not exceed 15% percent, or \$65.625 million, of the base revenue levels of \$437.5 million approved by the Commission in the most recent completed MAWC general rate case, Case No. WR-2022-0303.

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Revenue Requirement in WR-2022-0303	\$437,500,000
WSIRA Cap per Legislation	15%
WSIRA \$ Cap	$$65,625,000^2$
Prior Approved – WSIRA WO-2023-0427	\$26,679,890
Prior Approved - WSIRA WO-2024-0195	\$20,815,934
Current Case - WSIRA WR-2025-0009	\$15,837,357 ³

As part of its analysis of MAWC's Petition, Staff reviewed supporting workpapers, descriptions of WSIRA projects, MAWC's accounting entries, and invoices representing WSIRA investment costs, as well as other applicable documentation, such as work order authorizations. Staff communicated with MAWC personnel to clarify MAWC's Petition when necessary. Staff also visited and inspected many sites which had WSIRA-eligible infrastructure system projects placed into service during the audited period.

THE PETITION

MAWC states in its Petition, as follows:

MAWC, per this Petition, seeks to change a WSIRA to provide for the recovery of costs for infrastructure system projects eligible for WSIRA recognition. The proposed WSIRA rate schedules filed concurrently with this Petition reflect the appropriate pre-tax revenues necessary to produce net operating income equal to MAWC's pretax weighted cost of capital multiplied by the net original cost of the eligible infrastructure system projects, including recognition of accumulated deferred income taxes and accumulated depreciation associated with eligible infrastructure system projects which are included in the petition to establish or change a WSIRA pursuant to Sections 393.1500 through 393.1509. MAWC also seeks to recover all state, federal and local income or excise taxes applicable to such income and to recover all other costs such as depreciation expense and property taxes due within 12 months of this filing.

MAWC states that the water or sewer utility plant projects for which it seeks recovery of pretax revenues consist of the following:

² According to Section 393.1506.1, RSMo, replacement of customer-owned lead service lines does not count toward the program cap. MAWC did not include in this WSIRA filing costs related to the replacement of customer-owned lead service lines.

³ Includes WSIRA revenue adjustments for reconciliation and a revenue cap adjustment.

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- 1. Replacement of or cleaning and relining of existing water and sewer pipes, and associated valves, hydrants, meters, service lines, laterals, sewer taps, curbstops, and manholes;
- 2. Replacement of lead mains, lead goosenecks and 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; and
- 6. Replacement of Supervisory Control and Data Acquisition System (SCADA) components necessary for the operation and monitoring of remote installations including radio and cellular communication equipment, and programmable logic controllers.⁴

The Company's Petition indicates that its proposed water rate schedule (including estimated amounts for August, September, and October of 2024) will produce estimated WSIRA revenues of \$19,260,452, or an increase of 4.6%, based on the base water revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis.

The Company's Petition indicates that its proposed sewer rate schedule (including estimated amounts for August, September, and October of 2024) produce estimated WSIRA revenues of \$154,816, or an increase of 0.8%, based on the base sewer revenue level approved by the Commission in its most recently completed general rate proceeding on an annualized basis.

STAFF'S REVENUE CALCULATION

Staff agrees with MAWC's methodology in calculating the WSIRA revenue requirement for this filing. Staff replaced the estimated costs filed in the Petition and updated the balances with the actual cost for that period.

⁴ Section 393.1503(7), RSMo.

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During the course of its review, Staff identified a few accounting entries needing verification of WSIRA recovery eligibility. The Company agreed to remove those entries from the adjusted balances.

There were also a few entries Staff is recommending be disallowed for the WSIRA request as Staff does not believe them to be WSIRA eligible project expenses. These expenses are for security personnel during meter replacements in a high crime area of the state. It is Staff's position that the Company should not earn a return on that type of expense. Companies can experience security expenses associated with personnel guarding treatment plants, motor-pools, and other areas. Staff's position is that these expenses should be recovered as part of the normal rate case process. Additionally, there was one entry for door hangers, and the invoice was to Pennsylvania-American Water Company. Lastly, Staff identified entries related to employee expenses, meals, and lab supplies. Staff is recommending disallowance of these entries as Staff does not believe them to be WSIRA eligible project expenses. The effect of the disallowed expenses after depreciation and taxes is a total revenue requirement of \$15,251 less than the Company is requesting. After including the adjustment for the WSIRA reconciliation and the adjustment for the revenue cap, the effect of the disallowed expenses is a WSIRA revenue requirement of \$5 less than the company is requesting.

THE WSIRA RATE SCHEDULES

Water

The proposed WSIRA water rate schedules include a volumetric rate for each affected customer class (Rate A, Rate B and Rate J), with the rate to be determined through the use of the customer class billing determinants from the Company's last completed rate case, Case No. WR-2022-0303, and the WSIRA revenues allocated to each affected customer class (Rate A, Rate B and Rate J) for both St. Louis County and the All Other Missouri District.

Sewer

The proposed WSIRA sewer rate schedules include the WSIRA Revenue Requirement for all sewer customers divided by the revenues authorized from the Company's last completed rate case, Case No. WR-2022-0303. This calculation represents a percentage that will then be applied to the customer's total bill.

MAWC sewer customers are a mix of flat rate customers and metered customers. Because of this mix of rate design types for sewer customers, MAWC has proposed to continue a sewer WSIRA rate that is a percentage of the total customer bill. The revenues authorized in MAWC's most

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recent rate case were used as the basis because that should be the annual base rate revenue generated from the currently approved sewer rates. Therefore, including a surcharge of 0.4375% (for Arnold) and 4.8962% (for Other Sewer) of the customer bill should generate the appropriate sewer WSIRA revenue requirement.

For this case, Staff finds it reasonable to utilize the Company's methodology for calculating the WSIRA water and sewer rates based on Staff's calculation of the WSIRA water and sewer revenue requirements. The WSIRA rates are reflected in Appendix A1 through Appendix A4 attached to this Memorandum.

ASSESSMENTS AND ANNUAL REPORTS

MAWC is current on its quarterly assessment payments and is not delinquent for the prior year's assessments. MAWC does not have any past due annual reports.

STAFF RECONCILIATION

Section 393.1509.5(2), RSMo, requires a utility to reconcile the differences between the revenues resulting from a WSIRA and the appropriate pretax revenues, as found by the Commission, at the end of each 12-month calendar period that a WSIRA is in effect. The utility shall propose to recover or credit the difference, as appropriate, through the WSIRA. At this time, MAWC's WSIRA has been in effect for a 12-month period. Therefore, MAWC is required to reconcile its WSIRA revenues in this case. In the Company's updated workpapers, it calculated a reconciliation adjustment of \$1,120,219, indicating it has over-recovered WSIRA revenues in that amount since it began collecting the WSIRA. Staff agrees with this calculation.

STAFF'S CONCLUSIONS

In its Petition, MAWC filed to recover WSIRA-eligible infrastructure system project costs incurred during the period of May 1, 2024, through October 31, 2024. In the Petition, MAWC estimated an amount of additional plant investment for August, September, and October of 2024. At the time MAWC filed its Petition, MAWC proposed WSIRA revenues for water of \$19,260,452 and sewer revenues of \$154,816. The final, updated workpapers, which include the actual WSIRA investments through October, were received on November 18, 2024. These updated workpapers included decreases in the proposed revenues for water and increases in the proposed revenues for sewer.

Based upon its investigation and calculations, Staff concludes the Company's actual WSIRA rates should be designed to recover annual WSIRA revenues of \$12,585,444 from St. Louis County

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water customers, \$3,047,411 from All Other water customers, \$9,783 from Arnold sewer customers, and \$194,719 from All Other sewer customers for a total of \$15,837,357.

Staff's calculations reflect the overall weighted average cost of capital of 8.65% (tax grossed up rate of return) and MAWC's current depreciation rates, as reflected in the Stipulation and Agreement the Commission approved and ordered on May 3, 2023, in Case No. WR-2022-0303.

Staff's calculations reflect the actual WSIRA eligible investment placed in service from May 1, 2024 through October 31, 2024. In addition, no property taxes have been included in Staff's calculation, as there will be no property tax liability from MAWC due within the next 12 months related to these WSIRA investments.

Staff based its conclusions on an examination of workpapers and supporting documentation for the projects included for recovery in MAWC's proposed WSIRA filing, as well as from a review of the Stipulation and Agreement in Case No. WR-2022-0303. As a result, it is Staff's conclusion that the project costs incorporated within this WSIRA filing meet the requirements of the governing statutes as summarized previously in this Memorandum in the discussion of the Company's Petition. As per the enabling statute, neither Staff nor the Commission is making a determination of the ultimate prudency of any of the projects included in this WSIRA filing.

STAFF'S RECOMMENDATION

Based on the above, Staff recommends that the Commission issue an order that:

- 1. Rejects the following proposed tariff sheets filed in Tariff No. JW-2025-0026:
 - a. FORM NO. 13 P.S.C. MO NO. 13 9th Revised Sheet No. RT 11.1 Cancelling 8th Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 13 9th Revised Sheet No. RT 11.2 Cancelling 8th Revised Sheet No. RT 11.2;
- 2. Rejects the following proposed tariff sheets filed in Tariff No. JS-2025-0027:
 - a. FORM NO. 13 P.S.C. MO NO. 26 8th Revised Sheet No. RT 11.1 Cancelling 7th Revised Sheet No. RT 11.1, and
 - b. FORM NO. 13. P.S.C. MO No. 26 8th Revised Sheet No. RT 11.2 Cancelling 7th Revised Sheet No. RT 11.2;
- 3. Approves Staff's recommended WSIRA surcharge revenues in this docket in the incremental pre-tax revenue amount of \$12,585,444 from St. Louis County water

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customers, \$3,047,411 from All Other water customers, \$9,783 from Arnold sewer customers, and \$194,719 from All Other sewer customers for a total in this filing of \$15,837,357; and

4. Authorizes MAWC to file revised tariff sheets for each utility, service area, and customer class, as reflected in Staff's Appendix A1 – A4, which generates \$15,837,537.

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 Change a Water and Sewer Infrastructure Rate Adjustment (WSIRA) <u>Case No. WR-2025-0009</u> Tracking Nos. JW-2025-0026 and JS-2025-0027

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW KERI ROTH and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form;* and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 36^{2} day of November 2024.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377

Dianna L. Vaupt-Notary Public

Missouri-American Water Company Case No. WR-2025-0009 Staff's WSIRA Water Rate Design Calculation St. Louis District Water

	WS	IRA Recovery			
		Staff RevenueBilling DeterminantsRequirementSales (000 Gal) (1)			WSIRA Rate per 1000 Gal.
Rate A	\$	12,074,323	31,771,914	\$	0.38003
Rate B	\$	184,774	1,579,721	\$	0.11697
Rate J	\$	326,347	3,959,678	\$	0.08242
	\$	12,585,444	37,311,313	_	

	Pro	posed WSIRA	Rate I	Design Per 1,000 Gallo	ons	
		Current		Adjustment to	Pr	oposed WSIRA Rate
	W	SIRA Rate	Cur	rent WSIRA Rate (2)		to Use on Tariff
Rate Per 1000 Gal						
Rate A	\$	1.20861	\$	0.38003	\$	1.58864
Rate B	\$	0.37199	\$	0.11697	\$	0.48896
Rate J	\$	0.26211	\$	0.08242	\$	0.34453
(2) Calculated per at	ove					

	Pr	oposed WSIRA	A Ra	te Design Per 100 Gallor	าร	
		Current		Adjustment to	Pr	oposed WSIRA Rate
	W	SIRA Rate		Current WSIRA Rate		to Use on Tariff
Rate Per 100 Gal						
Rate A	\$	0.12086	\$	0.03800	\$	0.15886
Rate B	\$	0.03720	\$	0.01170	\$	0.04890
Rate J	\$	0.02621	\$	0.00824	\$	0.03445

Missouri-American Water Company Case No. WR-2025-0009 Staff's WSIRA Water Rate Design Calculation All Other District Water

	WSI	RA Recovery			
		aff Revenue equirement	Billing Determinants Sales (000 Gal) (1)	WSIRA Rate per 1000 Gal.	
Rate A	Ś	2,663,643	8,964,577	Ś	0.29713
Rate B	\$	92,634	1,214,373	\$	0.07628
Rate J	\$	291,135	2,971,865	\$	0.09796
	\$	3,047,411	13,150,816	_	

	Prop	osed WSIRA	Rate Des	ign Per 1,000 Gallo	ns	
	(Current	A	djustment to	Propo	sed WSIRA Rate
	W	SIRA Rate	Currer	nt WSIRA Rate (2)	to	Use on Tariff
Rate Per 1000 Gal						
Rate A	\$	0.68534	\$	0.29713	\$	0.98247
Rate B	\$	0.17594	\$	0.07628	\$	0.25222
Rate J	\$	0.22596	\$	0.09796	\$	0.32392
(2) Calculated per ab	ove					

	Pro	posed WSIRA	Rat	te Design Per 100 Gallon	s	
	(Current		Adjustment to	Pr	oposed WSIRA Rate
	W	ISRA Rate		Current WSIRA Rate		to Use on Tariff
Rate Per 100 Gal						
Rate A	\$	0.06853	\$	0.02971	\$	0.09825
Rate B	\$	0.01759	\$	0.00763	\$	0.02522
Rate J	\$	0.02260	\$	0.00980	\$	0.03239

Missouri-American Water Company Case No. WR-2025-0009 Staff's WSIRA Sewer Rate Design Calculation

	WSI Sta	rnold Sewer RA Recovery aff Revenue equirement
WSIRA Staff Revenue Requirement	\$	9,783
Revenues Authorized in Case No. WR-2022-0303	\$	6,640,662
Percent (%) Authorized Revenues		0.1473%

Customer Bill \$ 0.05758 RT 1.1

	Proposed WSIRA Sewer Ra	ite Design	
	Current	Adjustment to	Proposed WSIRA Rate
	WSIRA Rate	Current WSIRA Rate (1)	to Use on Tariff
Arnold Sewer	0.2902%	0.1473%	0.4375%
(1) Calculated per above			

Missouri-American Water Company Case No. WR-2025-0009

Staff's WSIRA Sewer Rate Design Calculation

All Other Sewer

		aff Revenue equirement
WSIRA Staff Revenue Requirement Revenues Authorized in Case No. WR-2022-0303	\$ \$	194,719 12,599,470
Percent (%) Authorized Revenues		1.5455%

Customer Bill		
\$	1.01011	RT 2.1
\$	0.83192	RT 3.1

Proposed WSIRA Sewer Rate Design			
	Current	Adjustment to	Proposed WSIRA Rate
	WSIRA Rate	Current WSIRA Rate (1)	to Use on Tariff
All Other Sewer	3.3507%	1.5455%	4.8961%
(1) Calculated per above			