

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

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

MOTION FOR LEAVE TO FILE CORRECTED TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), and respectfully requests leave to file the corrected Direct/Rebuttal Testimony of Staff witness Kimberly K. Bolin. In support of this motion, Staff states as follows:

1. On December 6, 2024, Staff and the other non-utility parties in this proceeding filed Direct/Rebuttal Testimony. Missouri-American Water Company (“MAWC”) subsequently filed Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony in response on January 24, 2025.

2. After reviewing the Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony of MAWC witness Brian LaGrand, Staff agrees with Mr. LaGrand that Staff mistakenly excluded Water and Sewer Investment Rate Adjustment (“WSRIA”) retirements in Staff’s calculations.¹

3. This correction decreases the percentage amount of plant additions since the last rate case that were included in WSRIA from 90% to 80%. This correction also impacts Staff’s calculation of the depreciation deferral and carrying cost deferral future revenue requirement impact.

4. Staff also mistakenly used MAWC’s projected yearly plant investment amount of \$400 million in its calculation of the depreciation deferral and carrying cost deferral. Staff stated in Ms. Bolin’s Direct/Rebuttal testimony that Staff used the five average yearly investment. Staff’s revised calculation uses the five-year average investment of \$338.4 million.

¹ Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony of Brian LaGrand, pg. 25, ln. 15-22.

5. The corrected numbers can be found on the following pages and lines of the attached corrected Direct/Rebuttal Testimony of Ms. Bolin:

- a. Page 14, lines 15, 18, and 19;
- b. Page 19, line 5; and
- c. Page 21, lines 12, 13, and 18.

6. The corrections are identified in tracked-change format in Attachment 1 (Red-Line Corrected Direct/Rebuttal Testimony of Kimberly K. Bolin). A clean version is attached as Attachment 2 (Clean Corrected Direct/Rebuttal Testimony of Kimberly K. Bolin).

7. Staff does not believe submitting these corrections will prejudice any party's ability to address the underlying testimony during the evidentiary hearing when Ms. Bolin takes the stand.

8. Staff would also like to note that these corrections would typically be addressed in Staff's surrebuttal testimony under normal rate case procedures before the Commission. However, because the procedural schedule ordered by the Commission in this case did not provide an opportunity for Staff to file surrebuttal testimony in response to MAWC's Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony, Staff had no opportunity to address the assertion made by Mr. LaGrand in pre-filed format. Staff is making this filing as expeditiously as possible under the circumstances.

WHEREFORE, Staff respectfully leave to file the attached corrected Direct/Rebuttal Testimony of Staff witness Kimberly K. Bolin.

Respectfully submitted,

/s/ Travis Pringle

Travis Pringle

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to all parties and/or counsel of record this 6th day of March, 2025.

/s/ Travis Pringle