

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

In the Matter of Missouri-American Water	)	
Company's Request for Authority to	)	File No. WR-2024-0320
Implement General Rate Increase for Water	)	File No. SR-2024-0321
and Sewer Service Provided in Missouri	)	
Service Areas	)	

**MECG’S OBJECTION TO THE SECOND PARTIAL  
STIPULATION AND AGREEMENT**

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and, pursuant to 20 CSR 4240-2.115(2)(B) objects to the *Amended Second Partial Stipulation and Agreement* filed on March 6<sup>th</sup>, 2025 and, states:

1. The Commission’s regulations require that parties objecting to a non-unanimous stipulation must identify the specific provision of the stipulation and agreement that is objected to and provide a reason for each objection.
2. MECG objects to the Universal Affordability Tariff Pilot Program contained within the stipulation for the following reasons: the proposal appears to be unlawful in that it unjustly discriminates between customers without a difference in service; the costs associated with the proposed program appear to be unlimited, not known, and not measured at this time; and the future rate treatment is not known at this time.
3. Furthermore, the tariff sheet purports to create a regulatory asset to defer any costs related to this program into a future period. Deferring costs incurred in one period to be considered for recovery in a future period is disfavored and should only be done in extraordinary circumstances. Here, if the purported extraordinary circumstance is the unaffordability of Missouri American’s proposed 40% rate increase, the Commission should address affordability by 1) rejecting the

company's requested 10.75% ROE, 2) rejecting the company's requested capital structure, 3) rejecting the company's requested RSM, 4) rejecting the company's requested production cost tracker, 5) rejecting the company's requested plant in service accounting deferrals. Taking these steps will more effectively address, within the established bounds of existing law, the unaffordability of Missouri American's rates.

WHEREFORE, MECG respectfully submits this objection.

Respectfully,

**/s/ Tim Opitz**

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ATTORNEY FOR MIDWEST  
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 7<sup>th</sup> day of March 2025:

**/s/ Tim Opitz**

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