BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water) Company's Request for Authority to Implement) General Rate Increases for Water and Sewer) Service Provided in Missouri Service Areas)

Case No. WR-2024-0320

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 Kelli Malki. 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 Ann E. Bulkley, Staff agrees with errors identified by Ms. Bulkley.¹

3. Staff appreciates Ms. Bulkley identifying these errors. The errors were in Staff's transcription of Ms. Bulkley's numbers from her direct/rebuttal testimony.

4. However, in light of these corrections, Staff's overall conclusions as outlined in Ms. Malki's Direct/Rebuttal Testimony remain the same, as the transcription error was isolated and did not affect Ms. Malki's analyses for Discounted Cash Flow ("DCF"), Capital Asset Pricing Model ("CAPM"), or bond yield plus risk premium ("BYPRP").

¹ Rebuttal/Surrebuttal/Sur-Surrebuttal Testimony of Ann E. Bulkley, pg. 80 and pgs. 88-89.

5. The corrections are to the following pages and lines of the Direct/Rebuttal Testimony of Ms. Malki:

- a. Page 38, table 4;
- b. Schedule KM-r1, columns D-L;
- c. Schedule KM-r3, columns C, D, G, H, and I; and
- d. Schedule KM-r4, column E and a portion of column T (rows 96-251).

6. A clean version of Ms. Malki's corrected page 38, Table 4 of her Direct/Rebuttal Testimony is attached as Attachment 1 (Corrected Direct/Rebuttal Testimony of Kelli Malki, page 38, table 4). A clean version of Ms. Malki's corrected schedules is attached as Attachment 2 (Corrected Schedules KM-r1, KM-r3, and KM-r4).

7. Staff does not believe submitting these corrections will prejudice any party's ability to address the underlying testimony.

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 Ms. Bulkley 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 Kelli Malki.

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Respectfully submitted,

<u>/s/ Travis Pringle</u>

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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 7th day of March, 2025.

/s/ Travis Pringle

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company's Request for Authority to Implement a General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas

Case No. WR-2024-0320

AFFIDAVIT OF KELLI MALKI

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW KELLI MALKI and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Corrected Direct / Rebuttal Testimony of Kelli Malki; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

KELLI MALKI

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 _____7 th____ day of March 2025.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070

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