

**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 General	)	
Rate Increase for Water and Sewer	)	Case No. WR-2024-0320
Service Provided in Missouri Service	)	
Areas	)	

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY**

**COMES NOW** the Office of the Public Counsel (“OPC”) and for its *Motion for Leave to file Supplemental Testimony*, states as follows:

1. On January 10, 2025, the OPC filed the Cross-Rebuttal testimony of Ms. Lena M. Mantle in the above styled case.
2. This testimony responded, in part, to the Direct/Rebuttal Testimony of Mr. Jarrod J. Robertson, a witness for the Staff of the Missouri Public Service Commission (“Staff”).
3. On the same day, Staff filed Mr. Robertson’s Cross-Rebuttal/Surrebuttal Testimony.
4. Mr. Robertson’s Cross-Rebuttal/Surrebuttal Testimony included meaningful corrections to his Direct/Rebuttal Testimony, upon which Ms. Mantle had relied and based her own Cross-Rebuttal testimony.
5. Because the procedural schedule ordered by the Commission in this case denies the OPC the opportunity to pre-file surrebuttal testimony in response to Staff’s cross-rebuttal, the OPC currently has no opportunity to address the changes that Mr.

Robertson made to his direct/rebuttal testimony in his cross-rebuttal testimony through pre-filed testimony.

6. The OPC therefore requests leave to file the attached supplemental testimony of Ms. Lena M. Mantle that addresses the changes made in Mr. Robertson's cross-rebuttal testimony in regards to the issue upon which Ms. Mantle originally filed cross-rebuttal testimony.

7. As stated, the OPC has not been afforded any opportunity to address the changes made in Mr. Robertson's cross-rebuttal testimony and will not be afforded any opportunity to do so in pre-filed testimony under the currently ordered procedural schedule.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission issue an order granting leave to file the attached *Supplemental Testimony of Lena M. Mantle* and to grant such other relief as is just and reasonable under the circumstances.

Respectfully submitted,

By:           /s/ John Clizer            
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this twenty-fourth day of January, 2025.

/s/ John Clizer