

FILED
March 27, 2025
Data Center
Missouri Public
Service Commission

Exhibit No. 324

OPC – Exhibit 324
Data Request OPC 8552
File No. WR-2024-0320

DATA INFORMATION REQUEST
Missouri-American Water Company
WR-2024-0320
General Rate Case

Requested From: Ashley M. Randell

Date Requested: 01/29/2025

Information Requested:

Please provide a narrative response to explain the driving force for the increased spending on heavy trucks since 2014?

Requested By: John Robinett (john.robinett@opc.mo.gov)

Information Provided:

On February 3, 2025, the Company objected to this data request for the following reason; a) the responsive information is not relevant to the subject proceeding, not proportional to the needs of the case considering the totality of the circumstances, nor reasonably calculated to lead to the discovery of admissible evidence in this case and is overly broad and burdensome in that the DR requests ten years of information in all but one of the DRs and eight years of information in the remaining DR.

Subject to and without waiving the objection, over the last several years, the Company has progressively replaced a higher concentration of heavy trucks that were purchased in 2007. In 2018, to help reduce the number of injuries and utility strikes, the Company started purchasing and utilizing more hydro-excavation trucks. These trucks are significantly more expensive than a standard heavy truck in comparison to a dump truck or crew truck. The Company has shifted to using more mini excavators rather than backhoes because this equipment is less intrusive and more mobile on a job site. Transportation of this equipment requires towing, which has contributed to increased quantities of and spending on heavy trucks. To improve employee safety, around 2018 heavy trucks started to be upfit with additional safety features such as 360 cameras and additional lighting. The heavy truck market continues to see stricter emissions requirements driving up costs. In general, the truck purchasing market has seen a significant increase in the Consumer Price Index since 2021 and has not yet returned to pre-2021 levels (see figure 1).

Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUUR0000SS45021

Not Seasonally Adjusted

Series Title: New trucks in U.S. city average, all urban consumers, not seasonally adjusted

Area: U.S. city average

Item: New trucks

Base Period: DECEMBER 1983=100

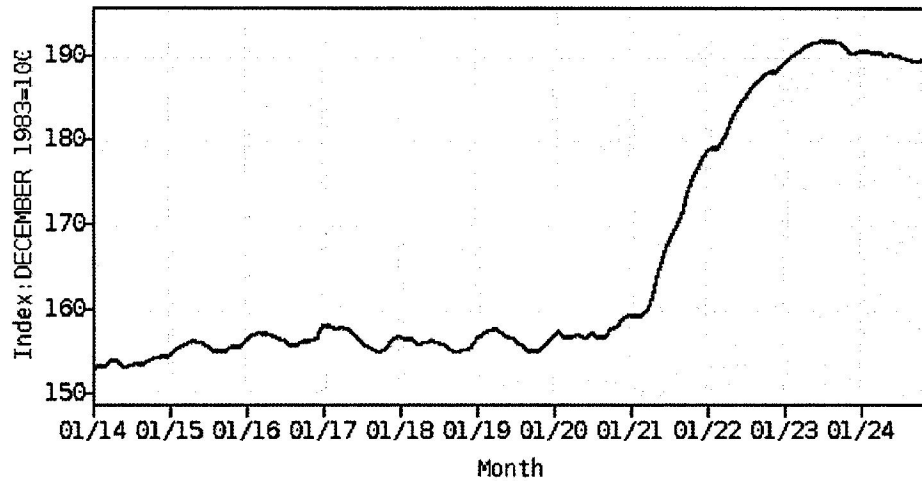


Figure 1 BLS New Truck CPI (<https://data.bls.gov/timeseries/CUUR0000SS45021>)

Responsible Witness: Derek Linam and Jody L. Carlson, P.E.