

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

In the Matter of Missouri-American Water )  
Company for a Certificate of Convenience )  
and Necessity Authorizing it to Install, )  
Own, Acquire, Construct, Operate, )  
Control, Manage and Maintain a Water )  
System and Sewer System in and around )  
the City of Neosho, Missouri. )

**File Nos. WA-2026-0072**

### **MAWC'S RESPONSE TO STAFF REPORT AND RECOMMENDATION**

**COMES NOW** Missouri-American Water Company (“MAWC”) and, for its Response to Staff Report and Recommendation states as follows to the Missouri Public Service Commission (“Commission”):

1. On September 24, 2025, MAWC filed an *Application and Motion for Waiver* requesting authority from the Commission to purchase the water and sewer utility assets of the City of Neosho, Missouri (“Neosho”), and permission, approval and a Certificate of Convenience and Necessity to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems for the public in an area in and around Neosho, Missouri. The cases were assigned File Nos. WA-2026-0072 and SA-2026-0073.

2. On January 29, 2026, the Staff of the Commission (“Staff”) filed its Staff Report and Recommendation and supporting Memorandum. Staff concluded that “all Tartan factors are satisfied. As such, Staff recommends that the Commission grant MAWC a CCN to provide water and sewer service in the proposed Neosho service area, subject to Staff’s proposed conditions.” (Staff Report, p. 1, para 3).

3. MAWC has reviewed the proposed conditions and actions listed on pages 22 through 24 of Staff's Memorandum and states that it objects to the following identified proposed conditions and actions for the reasons indicated:

- Item 2 (Approve existing MAWC water tariff P.S.C. MO No. 13, All Missouri Service Areas Outside of St. Louis County, and sewer tariff P.S.C. MO No. 26, 13th Revised Sheet No. RT 3.1, rates for the Systems to be acquired) – MAWC believes that such assignment of existing rates is not required by statute (Section 393.320, RSMo) and that it is most appropriate in this situation to order the use of Neosho's existing rates until such time those rates are addressed within a general rate case.
- Item 7 (MAWC shall initially establish NBV for the Neosho systems as of December 31, 2024, utilizing Staff's calculation of NBV for water and sewer assets \*\*  
\_\_\_\_\_. \*\*) – MAWC believes that use of these amounts to represent the "ratemaking rate base" is contrary to Section 393.320, RSMo.
- Item 8 (MAWC shall establish an acquisition regulatory asset in the amount of \*\*  
\_\_\_\_\_. \*\*. Rate recovery of this regulatory asset will be determined in MAWC's next general rate case.) – MAWC believes that use of an acquisition regulatory asset in this situation is contrary to Section 393.320, RSMo.

4. MAWC has no objection to the other 14 conditions and actions.

**WHEREFORE**, MAWC requests the Commission grant such relief as is just and proper

*(Nothing else on this page)*

in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document was sent by electronic mail to all counsel of record this 9<sup>th</sup> day of February 2026.

