

**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	)	File No. WR-2020-0303
Water and Sewer Service Provided in	)	File No. SR-2020-0304
Missouri Service Areas	)	

**INTERVENOR CITY OF RIVERSIDE'S STATEMENT OF POSITIONS ON THE  
ISSUES**

COMES NOW Intervener City of Riverside Missouri, by and through counsel, and for its *Statement of Positions on the Issues*<sup>1</sup>, states their position on the following limited issues:

**Single Tariff Pricing**

*Should the Commission consolidate Rate Class A across St. Louis County and non-St, Louis County customers?*

City of Riverside Position: The Commission should consolidate districts to protect the true residential rate payer. In addition to the unjust and unreasonable situation the true residential ratepayers experience due to the current rate design, it is aggravated by the rate design philosophy of "district specific rate making." It is unjust and unreasonable for a resident to pay a differential for her water just because she lives in a particular area.

**Rate Design**

A just and reasonable design would take that into consideration and establish a specific rate class for the true residential ratepayer who is responsible for paying their individual water bill and cannot recover the cost of their water through subsequent sale(s) of water.

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Wherefore the City of Riverside reserves its right to modify its position on these or any other issue raised in the case, as well as reserves its right to cross-examine witnesses and to file briefs in support of its position on any issue relevant to the matter.

Respectfully submitted,

SPENCER FANE LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that true copies of the foregoing Intervenor City of Riverside's First Data Request to Missouri-American Water Company was sent by e-mail this 22<sup>nd</sup> day of February 2023, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Joseph P. Bednar, Jr.  
Joseph P. Bednar, Jr.