

**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 Increase for) File No. WR-2017-0285
Water and Sewer Service Provided in)
Missouri Service Areas)

**INTERVENOR CITY OF JOPLIN'S SECOND SET OF DATA REQUESTS
TO MISSOURI-AMERICAN WATER COMPANY**

The City of Joplin ("Joplin") hereby provides the following Data Requests to Missouri-American Water Company ("MAWC") pursuant to the Commission's Rule 4 CSR 240-2.090. Joplin is requesting MAWC to respond to these requests within twenty (20) days of receipt.

27. Please identify any and all small water systems the Company has acquired since WR-2015-0301 and the date of acquisition.

28. In WR-2015-0301 Karl McDermott testified "The concentration and consolidation of companies in the water industry results in increased efficiency. This increase in efficiency allows for lower costs to serve customers as we as improve service." WR-2015-0301, McDermott Direct, 9: 3-5. Please identify and quantify any increased efficiency or lower costs as a result of the movement toward consolidated pricing in WR-2015-0301.

29. In WR-2015-0301 Karl McDermott testified: "Simplifying rate structures also leads to lower administrative costs as utilities can more easily help consumers who have questions, lower the cost of billing and collections, and reduce the regulatory cost of filing separate rate proceedings or at least separate filings within a single rate proceeding." WR-2015-0301, McDermott Direct, 16:10-14. Please identify and quantify any (1) lower administrative costs (2) lower cost of billing and collections or (3) lower regulatory costs as a

result of the movement toward consolidated pricing in WR-2015-0301.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ Marc H. Ellinger