BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Petition of Missouri-American Water Company for Approval to Change a Water and Sewer Infrastructure Rate Adjustment ("WSIRA")

Case No. WO-2022-0176

<u>RESPONSE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS</u> <u>TO THE COMMISSION STAFF'S RECOMMENDATION</u>

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and for its response to the *Petition to Change a Water and Sewer Infrastructure Rate Adjustment* ("Petition") filed by Missouri-American Water Company ("MAWC") and response to Staff's Recommendation states as follows:

1. On March 4, 2022, MAWC filed its Petition. On March 9, 2022, the Commission issued its *Order Directing Notice, Setting Deadlines, Directing Filings, Consolidating Cases and Suspending Tariffs* ("Order"). On June 2, 2022, the Staff filed its recommendation.

2. On June 3, 2022, the MIEC late-filed the *Direct Testimony of Greg Meyer* setting forth the MIEC's objections to MAWC's Petition.

3. For the reasons provided in the *Direct Testimony of Greg Meyer*, the MIEC objects to Staff's June 2 recommendation.

4. In support of its objection to Staff's recommendation, the MIEC incorporates by reference herein the objections and recommendations set forth in Mr. Meyer's testimony

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ <u>Diana M. Plescia</u> Diana M. Plescia, #42419 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105 Telephone: (314) 725-8788 Facsimile: (314) 725-8780 Email: dplescia@chgolaw.com

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 13th day of June, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia