

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	Case No. WR-2008-0311
A General Rate Increase for Water and Sewer)	SR-2008-0312
Service Provided in Missouri Service Areas.)	

MOTION TO MODIFY NOTICE PROVISIONS

Comes now Missouri-American Water Company (MAWC or Company), and, for its Motion to Modify Notice Provisions, states as follows to the Missouri Public Service Commission (Commission):

BACKGROUND

1. On March 31, 2008, MAWC filed proposed tariff sheets initiating the subject general rate cases. On April 3, 2008, the Commission issued its Suspension Order and Notice, Order Setting Hearings, Order Directing Filing and Order Consolidating Cases as to Case No. WR-2008-0311 and Case No. SR-2008-0312.

2. The Suspension Order, among other things, required MAWC to provide its customers with a specified notice of the local public hearings, evidentiary hearings and true-up hearings by either an on-bill message, a bill insert or a separate mailing. These notices were to be sent at least ten days, but not more than 45 days prior to each of the three events.

**MOTION TO MODIFY TIMING
AND/OR CONSOLIDATE NOTICES**

3. Because of the timing of the evidentiary hearing and true-up hearing, and the likely schedule for local public hearings (after the filing of non-company direct and before, during or shortly after the prehearing conference), MAWC would be required to provide three

separate notices to its customers. MAWC estimates that this notification process would cost approximately \$302,000 (See **Appendix A** attached hereto).

5. MAWC requests that the Commission modify its Suspension Order and Notice to allow MAWC to provide a single notice to customers that would contain the dates for the local public hearing, evidentiary and true-up hearing on a single document. This document would be provided to customers in the St. Louis District at least ten days, but not more than 45 days prior to the local public hearing(s) to be conducted in that district. In all other districts, the document could be provided as an insert with regular billings (again, at least ten days, but not more than forty-five days prior to the local public hearing). No separate notice would be provided prior to the evidentiary and true-up hearings.

6. MAWC believes that consolidating the notices in this fashion provides the following advantages:

- a) Consolidating the dates on one document provides a better reference tool for customers and should make the process more understandable;
- b) The single notice can utilize a larger, and more readable, format; and,
- c) This approach will lead to significant cost savings to our customers.

7. MAWC proposes to provide the notice in a time frame most relevant to the local public hearings. This provides notice for the proceeding most relevant to the gathering of customer comments and would be less confusing than providing three separate notices for three separate events.

8. If this Motion is granted, MAWC would propose to use the following procedure for the notification of customers:

- **St. Louis County District** (customers billed quarterly) – Direct mail a full calendar of hearings to customers on a 6” x 9” postcard, 10 to 45 days in advance of the St. Louis County public hearing(s) . The consolidated notice would show the St. Louis County public hearing(s) information and the evidentiary and true-up hearings information.
- **All other locations** (customers billed monthly). Include 7”x7” bill insert. The bill insert would show the public hearing date in (or closest to) the customer’s community, plus the evidentiary and true-up hearing information.
- The MAWC web site address would also be added to the notice. A full schedule of the hearings would be available by utilizing a link provided on the Company home page.

9. It is estimated that this process would result in a savings of approximately \$174,000 in rate case expense as compared to three mailings to each customer (See **Appendix A** attached hereto).

10. The Commission granted a similar request in MAWC’s last rate case. *See In the Matter of Missouri-American Water Company’s Request for Authority to Implement a General Rate Increase*, Adopting Procedural Schedule and Approving Motion to Modify Suspension Order and Notice, Case No. WR-2007-0216 (February 22, 2007). In that rate case, significant savings were realized, while still providing timely and adequate notice of the local public hearings.

MOTION TO MODIFY NOTICE CONTENT

11. The Commission’s Suspension Order and Notice, among other things, also directs a specified form of notice. That form of notice references both the water and sewer increases sought by MAWC in this consolidated case. A similar notice was used in MAWC’s last rate case (Case No. WR-2007-0216).

12. The nature of MAWC’s customer base is such that its water customers

(approximately 456,000) greatly outnumber its sewer customers (approximately 1,000). With the exception of the Warren County district, there is little, if any, overlap between the two.

However, MAWC does perform bill collection for other sewer providers within its various districts and many MAWC customers receive a sewer charge on their bill, although MAWC is not the sewer provider. An example of this is found here in the Jefferson City district.

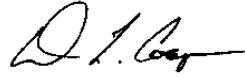
13. MAWC discovered in its last rate case that including both the water and sewer information on the customer notice in districts where MAWC is not the sewer provider quite often caused confusion among those attending the local public hearings.

14. Accordingly, MAWC asks that the Commission modify its order to allow MAWC to provide only water increase information to its water customers and sewer increase information to its sewer customers. A proposed notice for water customers is attached hereto as **Appendix B** to and a proposed notice for sewer customers is attached hereto as **Appendix C**.

WHEREFORE, MAWC respectfully requests the Commission to issue its order granting the

Motion to Modify that is described herein in regard to timing and notice content.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 6th day of May, 2008, to:

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