

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of:)	
)	<u>Case No. WR-2007-0216</u>
Missouri-American Water Company's)	Tariff File Nos.:
Request for Authority to Implement)	YW-2007-0407
a General Rate Increase for Water Service)	YW-2007-0409
Provided in Missouri Service Areas)	YW-2007-0410
)	YW-2007-0411
)	YW-2007-0412
)	YW-2007-0413

METROPOLITAN ST. LOUIS SEWER DISTRICT'S
FIRST SET OF DATA REQUESTS DIRECTED TO
MISSOURI-AMERICAN WATER COMPANY

Dated May 11, 2007

MSD Data Request 1:

Please identify the following:

- a. the total number of water meter readers employed by Missouri-American Water Company (MAWC) during the test year (to the extent MAWC contracts with a third-party vendor or any other entity to conduct its water meter readings, please provide all documents reflecting the total number of water meter readers deployed by or on behalf of MAWC during the test year);
- b. the total number of water meter readers employed by Missouri-American Water Company (MAWC) to read St. Louis County water meters during the test year (to the extent MAWC contracts with a third-party vendor or any other entity to conduct its water meter readings, please provide all documents reflecting the total number of water meter readers deployed by or on behalf of MAWC to read St. Louis County water meters during the test year);
- c. the total amount of compensation paid to the water meter readers identified in your answer to MAWC DR 1(a);
- d. the total amount of compensation paid to the water meter readers identified in your answer to MAWC DR 1(b);

- e. the total number of water meters read by or on behalf of MAWC during the test year;
- f. the total number of monthly water meter reads taken by or on behalf of MAWC during the test year;
- g. the total number of quarterly water meter reads taken by or on behalf of MAWC during the test year;
- h. the total number of water meters read on behalf of MAWC in St. Louis County during the test year;
- i. the total number of monthly water meter reads taken by or on behalf of MAWC in St. Louis County during the test year; and
- j. the total number of quarterly water meter reads taken by or on behalf of MAWC in St. Louis County during the test year.

MSD Data Request 2:

Please produce all documents reflecting and/or evidencing the figures identified in MAWC's responses to MSD DR 1(a)-(j).

MSD Data Request 3:

The Direct Testimony of Thomas M. Deters, Manager-Network for MAWC's Eastern Operations, filed by MAWC in the matter of *MSD v. MAWC*, Case No. WC-2007-0040, indicates that "[t]he budgeted cost for meter reading in St. Louis County for 2007 is \$1,926,210." *See* Deters Testimony at 4:10. Please produce all documents supporting this amount, including but not limited to, all source and other documents upon which MAWC relied in computing this amount.

MSD Data Request 4:

Please identify the following:

- a. MAWC's total direct cost of labor for meter reading during the test year;
- b. MAWC's total indirect cost of labor for meter reading during the test year;
- c. MAWC's total vehicle expenses for meter reading during the test year;

- d. MAWC's total equipment expenses for meter reading during the test year; and
- e. Any other expenses or costs incurred by MAWC in connection with its meter reading operations during the test year or any other expenses or costs otherwise allocated to MAWC's meter reading operations during the test year.

MSD Data Request 5:

Please produce all documents reflecting and/or evidencing the amounts identified in MAWC's responses to MSD DR 4(a)-(e).

MSD Data Request 6:

Please identify the following:

- a. MAWC's total direct cost of labor for meter reading in St. Louis County only during the test year;
- b. MAWC's total indirect cost of labor for meter reading in St. Louis County only during the test year;
- c. MAWC's total vehicle expenses for meter reading in St. Louis County only during the test year;
- d. MAWC's total equipment expenses for meter reading in St. Louis County during the test year; and
- e. Any other expenses or costs incurred by MAWC in connection with its meter reading operations in St. Louis County only during the test year or any other expenses or costs otherwise allocated to MAWC's meter reading operations in St. Louis County only during the test year.

MSD Data Request 7:

Please produce all documents reflecting and/or evidencing the amounts identified in MAWC's responses to MSD DR 6(a)-(e).

MSD Data Request 8:

The Direct Testimony of Thomas M. Deters, Manager-Network for MAWC's Eastern Operations, and Schedule TMD-1 thereto, filed by MAWC in the matter of *MSD v. MAWC*, Case No. WC-2007-0040, indicates that it has cost MAWC a total of \$35,100,770 to install its St. Louis County water meters, which includes the cost of the water meters, in the amount of \$22,965,387, and the costs incurred in installing such meters, in the amount of \$12,135,383. *See* Deters Testimony 4:16-17 and Schedule TMD-1 referenced therein. Please produce all documents supporting these amounts, including but not limited to, all source and other documents upon which MAWC relied in computing each of these amounts. Please state whether the \$35,100,770 amount represents the value of the St. Louis County water meter assets on MAWC's balance sheet. If so, please provide the depreciation schedule. If the \$35,100,770 amount includes replacement/new meter costs, please provide the costs per meter (meter cost and installation cost), aging report for current meters and replacement schedule.

MSD Data Request 9:

For each year from 2002 through the test year, please state the total incremental cost incurred by MAWC in providing MSD with the water usage and customer identification data contemplated under the Agreement entered into between MSD and MAWC on or about February 14, 2002 ("Water Usage Data"), and also itemize each separate expense included in your calculation of the total incremental cost, including, but not limited to, all processing costs incurred in converting the data for MSD's use, all costs incurred in maintaining and updating the secure web site from which MSD procures such data, and all other costs associated with the provision of such data to MSD (*i.e.*, labor, software, information systems/IT, etc.).

MSD Data Request 10:

Please produce all documents reflecting and/or evidencing the amounts identified in MAWC's response to MSD DR 9.

MSD Data Request 11:

For each year from 2002 through the test year, please state the total incremental cost incurred by MAWC in providing water usage and customer identification data to sewer districts and municipal sewer systems other than MSD ("other sewer districts and systems"), and also

itemize each separate expense included in your calculation of the total incremental cost, including, but not limited to, all processing costs incurred in converting the data for use by the other sewer districts and systems, all costs incurred in maintaining and updating the secure web site from which the other sewer districts and systems procure such data, and all other costs associated with the provision of such data to the other sewer districts and systems (*i.e.*, labor, software, information systems/IT, etc.).

MSD Data Request 12:

Please produce all documents reflecting and/or evidencing the amounts identified in MAWC's responses to MSD DR 11.

MSD Data Request 13:

The Direct Testimony of Thomas M. Deters, Manager-Network for MAWC's Eastern Operations, filed by MAWC in the matter of *MSD v. MAWC*, Case No. WC-2007-0040, indicates that "[t]he revenue that MAWC receives from MSD is 'above-the-line'—that is, it operates to reduce MAWC's operating expenses and therefore reduces its revenue requirement and corresponding rates to customer." *See* Deters Testimony at 14:9-11. Please produce all MAWC financial documents from 2002 through the test year, which reflect and/or support this statement.

MSD Data Request 14:

With respect to MAWC's revenue projections for the test year and/or any years subsequent to the test year, please state the following:

- a. the amount(s) MAWC has assumed would be paid by MSD for the provision of Water Usage Data;
- b. the amount(s) MAWC has assumed would be paid by sewer districts and municipal sewer systems other than MSD for the provision of water usage and customer identification data;
- c. the impact on rates of other classes of MAWC customers should the amount(s) set

forth in your response to MSD DR 14(a) not be paid by MSD for whatever reason;

d. the impact on rates of other classes of MAWC customers should the amount(s) set forth in your response to MSD DR 14(b) not be paid for whatever reason;

MSD Data Request 15:

Please produce all documents reflecting and/or supporting the amounts set forth in MAWC's responses to MSD DR 14(a)-(d), including all source and other documents upon which MAWC relied in computing each of the amounts set forth in MAWC's responses to MSD DR 14(a)-(d).

MSD Data Request 16:

Please provide copies of MAWC's responses to the following Public Service Commission Staff Data Requests:

- a. 2;
- b. 5;
- c. 12 and 12.1;
- d. 14;
- e. 15(b);
- f. 20, 21, 22, 23;
- g. 41,
- h. 50, 131, 142 (in connection with water meter readers, employees involved in the provision of Water Usage Data to MSD and/or employees involved in the installation of water meters);
- i. 51 (in connection with water meter readers, employees involved in the provision of Water Usage Data to MSD and/or employees involved in the installation of water meters);
- j. 52 (to the extent MAWC uses part-time/temporary employees to conduct water

meter reads and installations and/or to provide Water Usage Data to MSD);

k. 54 (limiting the roster to water meter readers, employees involved in the provision of Water Usage Data to MSD and/or employees involved in the installation of water meters);

l. 68 and 68.1;

m. 82;

n. 90 and 94 (updated financial information in response to Staff DR No. 90);

o. 96.1 (as it relates to MAWC)

p. 98.1;

q. 106;

r. 116;

s. 121;

t. 132;

u. 139 (to the extent it relates to water meter readers, employees involved in the provision of Water Usage Data to MSD and/or employees involved in the installation of water meters)

v. 165;

w. 177 (c) and (d);

x. 184;

y. 217 (sub-part 1 only); and

z. 243.

MSD Data Request 17:

Please provide copies of MAWC's annual reports to the Missouri Public Service Commission for the three most recently concluded fiscal years.

MSD Data Request 18:

Please provide copies of any of MAWC's responses to any Data Requests directed to MAWC in this proceeding, including all work papers produced by MAWC in response to PSC Staff DR 1, which contain information that MAWC believes is relevant to the costs incurred by MAWC in providing Water Usage Data to MSD or otherwise relevant to the dispute between the parties in the proceeding pending before the Public Service Commission, captioned, *MSD v. MAWC*, Case No. WC-2007-0040.

Respectfully submitted,

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**ATTORNEYS FOR METROPOLITAN
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 11th day of May, 2007, a true and accurate copy of the foregoing document was served via electronic submission by way of the Public Service Commission's EFIS System and via electronic mail, upon all counsel of record in this proceeding.

