

Exhibit No.:  
Issues: Cost of Service  
Witness: Wesley E. Selinger  
Exhibit Type: Rebuttal  
Sponsoring Party: Missouri-American Water Company  
Case No.: WR-2022-0303  
Date: January 25, 2023

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. WR-2022-0303**

**REBUTTAL TESTIMONY**

**OF**

**WESLEY E. SELINGER**

**ON BEHALF OF**

**MISSOURI-AMERICAN WATER COMPANY**

**AFFIDAVIT**

I, Wesley E. Selinger, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am Director, Rates and Regulatory for American Water Works Service Company Inc. that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.



The image shows a handwritten signature in black ink. The signature consists of stylized initials "WES" followed by a surname. Below the signature, the name "Wesley E. Selinger" is printed in a standard font, with a horizontal line extending from the end of the signature across the page.

January 25, 2023  
Dated

**DIRECT TESTIMONY**  
**WESLEY E. SELINGER**

**MISSOURI AMERICAN WATER COMPANY**  
**CASE NO.: WR-2022-0303**  
**CASE NO.: SR-2022-0304**

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## **REBUTTAL TESTIMONY**

**WESLEY E. SELINGER**

### **I. INTRODUCTION**

1   **Q.**   **Please state your name and business address.**

2   A.    My name is Wesley E. Selinger and my business address is 727 Craig Road, Saint Louis,

3                 Missouri 63141.

4   **Q.**   **Are you the same Wesley E. Selinger who previously submitted Direct Testimony in**

5                 **this proceeding?**

6   A.    Yes.

7   **Q.**   **What is the purpose of your Rebuttal Testimony?**

8   A.    The purpose of my Rebuttal Testimony is to address various issues within the testimonies

9         of Missouri Public Service Commission Staff (“Staff”) witness Roth and Missouri

10      Industrial Energy Consumers (“MIEC”) witness York regarding Missouri American’s

11      (“MAWC” or “the Company”) Cost of Service Studies.

### **II. RESPONSE TO STAFF COSS**

13   **Q.**   **Did the Company submit Class Cost of Service Studies (“COSS”) in this case?**

14   A.    Yes, the Company submitted separate COSSs for its water service territories in St. Louis

15      County and Outside of St. Louis County as well as a wastewater cost of service study. The

16      COSSs were attached to my direct testimony as Schedules WES-1, WES-2, and WES-3.

17   **Q.**   **Did other parties to this case raise concerns regarding the Company’s COSSs.**

18   A.    Yes. MIEC witness York raised several concerns regarding the Company’s cost of service

19      studies in her direct testimony. Staff produced its own cost of service study but did not

20      directly address any cost-of-service issues from my direct testimony.

1   **Q.**   **What items will you be addressing regarding Staff's COSS report?**

2   A.   As stated in the testimony of Ms. Roth, Staff anticipates some updates to its COSS report

3       before the conclusion of this case. The Company is still waiting on certain information it

4       requested of Staff regarding its report. I will briefly address several items/differences

5       between the Company's COSSs and Staff COSS report including:

6       - Staff's use of a one-step approach to allocating revenue requirements vs. the Company's

7           two-step approach which allocates revenue requirements to business functions and then

8           business function revenue requirements to customer classes;

9       - Staff's treatment of plant and depreciation related to MAWC's Transmission and

10           Distribution mains;

11       - Staff's omission of an adjustment to account for sale for resale and certain large industrial

12           customers who take service directly from the Company's Transmission system; and

13       - Staff statement regarding the Company's tracking of usage between public and private fire

14           service.

15   **Q.**   **Please describe the difference between Staff's one-step approach to revenue**

16       **requirement allocation and the Company's two-step allocation.**

17   A.   Staff's COSS allocates each cost account directly to MAWC's customer classes assuming

18       that customers directly cause each cost to be incurred. MAWC's COSSs first allocates

19       costs to its business functions i.e., Supply, Pumping, Storage, Meters etc. among others

20       and then allocates the revenue requirement associated with each business function to

21       customer class. This added step is more intuitive, understandable, and reflects how the

22       business operates while maintaining adherence to cost-causation principles.

23   **Q.**   **Please describe Staff's treatment of transmission and distribution plant and**

1           **depreciation.**

2   A. Staff has included all transmission and distribution mains into one cost category.

3   **Q. Do you agree with Staff's treatment of transmission and distribution mains?**

4   A. No, the Company distinguishes between costs associated with transmission mains (10-inch  
5       and above) and distribution mains (10-inch or less) and maintains separate plant sub-  
6       accounts that capture the costs associated with different sizes of mains. This allows for a  
7       more accurate allocation of these costs among classes.

8   **Q. Has Staff made any adjustment to its COSS related to transmission and distribution  
9       mains?**

10   A. On page 8-9 of her direct testimony Staff witness Roth explains that Staff has proposed an  
11       adjustment to its COSS to account for sale for resale and certain large customers that are  
12       connected directly to the transmission system.

13   **Q. Do you agree that such an adjustment should be made?**

14   A. Yes, MAWC has made a similar adjustment in its COSSs.

15   **Q. Were you able to determine how Staff applied its adjustment within its COSS?**

16   A. No. It was not clear where in Staff's COSS workpapers such an adjustment was made.  
17       The Company has inquired with Staff on this subject and anticipates Staff will include such  
18       an adjustment with its updates later in this proceeding.

19   **Q. Please describe Staff's concerns around the Company's maintenance of public and  
20       private fire annual usage data.**

21   A. On page 8 of her direct testimony Ms. Roth states that the Company does not currently  
22       separately track the number of annualized gallons for private fire service or public fire  
23       service.

1      **Q.    Is this true?**

2      A.    No. It is true that the Company does not meter public fire and therefore estimates  
3                 annualized gallons based on hydrant count and size. The Company does however maintain  
4                 annualized usage information for private fire service as shown on the “Usage Statistics”  
5                 tab of MAWC’s COSSs.

6

### 7                 **III. RESPONSE TO MIEC**

8      **Q.    Has MIEC witness Ms. York raised issues with MAWC’s Cost of Service studies?**

9      A.    Yes. Ms. York has addressed several items and made several recommendations regarding  
10                 MAWC’s COSSs including:

- 11                 - That fixed Power and Pumping expenses be allocated using Factor 3 instead of Factor 2;
- 12                 - That Purchased Power expenses be allocated using Factor 6 instead of Factor 1;
- 13                 - That the Distribution Multiplier used to develop Factor 4 be corrected to reflect the length  
14                 of distribution mains serving sale for resale and certain large customers that take service  
15                 directly from MAWC’s transmission system; and
- 16                 - Plant investment and depreciation expense in mains sized 10-16 inches be assigned to the  
17                 distribution functional cost category instead of the transmission functional cost  
18                 category

19      **Q.    Ms. York recommends that fixed power and pumping costs be allocated using Factor  
20                 3 rather than Factor 2, do you agree.**

21      A.    Yes, the use of Factor 2 for allocating these expenses in the Company’s COSSs was  
22                 inadvertent and the Company has stated in response to discovery that it agrees the  
23                 appropriate allocation factor for these expenses is Factor 3.

24      **Q.    Please explain Ms. York’s position regarding the appropriate allocation factor for**

1           **Fuel and Power expenses.**

2       A. Ms. York's position is that MAWC's electric provider in St. Louis County, Ameren  
3           Missouri, charges commercial rates that vary based on seasonal and peak and off-peak  
4           periods; therefore, the use of an allocator based on annual usage is not appropriate and  
5           should be replaced with an allocator that includes components related to average daily and  
6           hourly usage and extra daily and hourly capacity.

7       **Q. Do you agree with Ms. York's recommendation?**

8       A. No. First, it is important to recognize MAWC's customers' peak demands as well as how  
9           the Company manages its operational requirements in response to those demands. For  
10          instance, MAWC's customers' peak customer demand typically occurs during the summer  
11          in the early morning due to the requirements of irrigation and several other factors.  
12          MAWC addresses this peak by pumping twice as much at night filling tanks during off-  
13          peak hours. Therefore, there is limited, if any correlation between increases in customer  
14          peak demand and increases in purchased power costs. It should be generally noted that as  
15          the delivery system moves upstream from the end-user it is designed to meet a diversity of  
16          demands that is focused less on hourly peak demands of customers and fire service and  
17          more on total daily requirements. It should also be noted that not every commercial electric  
18          rate charged to MAWC facilities includes a demand charge.

19       **Q. Has MIEC made any criticisms regarding the treatment of Transmission and  
20           Distribution mains within MAWC's COSSs?**

21       A. Yes. In her direct testimony, MIEC witness Ms. York has raised concerns regarding the  
22           Company's distribution multiplier as well as its assignment of mains sized 10-16 inches to  
23           the Transmission function. I will address each of these issues in more detail below.

1     **Q. If Ms. York's adjustments to the allocation of Transmission and Distribution mains**  
2         **were to be implemented what would be the result to the allocation of distribution**  
3         **mains in the Company's cost of service?**

4     A. Ms. York's recommendations would result in Rate J customers being allocated essentially  
5         no costs associated with the Company's Distribution system. For instance, in the  
6         Company's COSS for St. Louis County, Rate J customers' cost of service for Distribution  
7         system costs is \$1,831,675. After implementing Ms. York's adjustments Rate J customers  
8         would be assigned only \$57,648 in Distribution System costs. Ms. York's adjustments  
9         shift 97% of Rate J customers allocation of Distribution costs to MAWC's other classes.  
10         From a total cost of service basis, these adjustments shift approximately \$3.6 million  
11         dollars of Rate J's cost of service to MAWC's other classes, primarily MAWC's  
12         Residential customers.

13     **Q. Is the allocation of \$57,648 in Distribution system costs to Rate J customers**  
14         **reasonable?**

15     A. No, it is not. The is essentially saying the Rate J class doesn't use the Company's  
16         Distribution system at all, which is not true.

17     **Q. Ms. York criticizes the Company's method for developing its distribution multiplier**  
18         **stating that MAWC needs to also consider the length of distribution main serving**  
19         **Rate J customers, do you agree?**

20     A. No, I do not. The costs of mains in MAWC's cost of service study are allocated using the  
21         Base/Extra capacity allocator which is a usage-based allocator. The distribution multiplier  
22         is intended to reflect the amount of Rate J usage to which this usage-based allocator applies.  
23         MIEC is recommending using a percentage of system allocator. Mixing these two types

1           of allocators together is not reasonable and results in an apples to oranges comparison.

2       **Q. Are there additional reasons why you disagree with Ms. York's criticism of MAWC's  
3           Distribution multiplier?**

4       A. Determining the length of distribution main serving these customers does not adequately  
5           allocate the "cost" of providing service. There is a different cost associated with each size  
6           and type of main. There are different circumstances that drive the amount capitalized as  
7           part of each main installed. It is not feasible to conduct an analysis that would accurately  
8           capture the myriad of factors that determine this and to calculate an individual customer  
9           rate. The customers included within the Company's sample account for 72% of the Rate J  
10          usage for the St. Louis County sale for resale and Rate J rate classes. Calculating the  
11          distribution multiplier based on these customers' utilization of the Company's distribution  
12          infrastructure is a reasonable approach to calculating the distribution multiplier.

13       **Q. Has Ms. York provided any analysis or made any recommendations on what she feels  
14           the appropriate distribution multiplier should be?**

15       A. Yes. Ms. York used a figure for small distribution mains from a 2008 rate case and divided  
16           that by the Company's total length of distribution mains in its annual report to derive a  
17           1.04% distribution multiplier.

18       **Q. Is the use of 15-year-old data appropriate for developing the distribution multiplier  
19           in this case?**

20       A. No, it is not. As Ms. York points out there have been changes to the Rate J customer base  
21           since 2008. It is entirely possible to think that while the number of Rate J customers overall  
22           has decreased since 2008 some customers may have been added increasing the amount of  
23           distribution footage serving these customers.

1     **Q. Ms. York explains that Staff's cost of service study in MAWC's last rate case reflected**  
2         **a distribution multiplier of 10% for Rate J, was Staff's cost of service study, or more**  
3         **specifically, Staff's 10% distribution multiplier approved by the Commission?**

4     A. No, it was not. MAWC's most recent general rate case was decided via settlement and the  
5              Commission did not approve a specific distribution multiplier or a methodology for  
6              calculating such an adjustment.

7     **Q. Please explain Ms. York's recommendation regarding the allocation of Transmission**  
8         **and Distribution Mains.**

9     A. Ms. York recommends moving the depreciation expense and plant investment cost  
10              associated with mains sized 10-16-inches from the Transmission function to the  
11              Distribution function.

12    **Q. What would be the effect of Ms. York's adjustment?**

13    A. Reclassifying mains sized 10-16-inches as Distribution mains and assigning the associated  
14              plant and depreciation expense to the Distribution function would significantly shift the  
15              costs associated with those mains from Rate J to the smaller customers classes.

16    **Q. For COSS and ratemaking purposes how has MAWC historically separated**  
17         **Transmission and Distribution mains?**

18    A. For at least the last 15 years MAWC has considered mains 10 inches or larger to serve the  
19              Transmission function and mains smaller than 10 inches to serve the Distribution function.

20    **Q. What basis has Ms. York used to support her recommendation?**

21    A. Ms. York explains that the Company's cost of service study reflects footage for  
22              Transmission and Distribution mains based on MAWC's 2021 annual report which  
23              classifies mains for St. Louis County under 16-inches as distribution mains.

1   **Q. Was the main footage from MAWC's 2021 annual report used in your COSS?**

2   A. Yes. I did rely on the information in the annual report but believe that classifications in  
3   the annual report should be revisited to appropriately match how mains are classified for  
4   ratemaking and COSS purposes. MAWC will work to align the information in its annual  
5   report with how these assets have historically been classified for ratemaking and COSS  
6   purposes.

7   **Q. What impact did the use of this information have on the results of your COSS?**

8   A. It had a very minimal effect. As shown in the table below, after correctly separating the  
9   annual report data for St. Louis County to reflect the appropriate Transmission and  
10   Distribution footage and inputting it into MAWC's COSS the resulting revenue  
11   responsibilities for each class show that this had virtually no impact on the results of the  
12   study.

	<b>Initial Filing</b>	<b>Revised</b>
Residential	\$ 235,875,240	\$ 235,810,790
Non-Residential	\$ 66,901,926	\$ 66,904,123
Rate J	\$ 11,770,678	\$ 11,798,195
Rate B	\$ 4,747,694	\$ 4,762,691
Rate P	\$ 6,621,552	\$ 6,648,167
Public Fire	\$ -	\$ -
Rate F - Private Fire	\$ 5,660,451	\$ 5,653,573
Total	\$ 331,577,541	\$ 331,577,541

13   **Q. Are you sponsoring any updates to your COSSs at this time?**

14   A. Yes. As discussed above, the Company maintains separate plant subaccounts for mains  
15   of different sizes. There are four plant subaccounts in total, one for mains 4 inches in  
16   diameter or less, one for mains greater than four inches and less than ten inches in diameter,  
17   mains 10-16 inches in diameter, and one account for mains greater than sixteen inches in  
18   diameter.

1 diameter. While preparing responses to discovery in this case it became known that some  
2 mains and the associated costs were not in the appropriate bucket. MAWC took the  
3 necessary action and moved those costs into the appropriate size bucket for purposes of its  
4 COSS. MAWC is filing revised COSS schedules WES-1R and WES-2R which reflect the  
5 changes described above.

6 Q. Can you demonstrate the impact of these changes on the results of MAWC's COSSs?

7 A. Yes. The tables below reflect each rate class's required revenue increase in both the  
8 Company's originally filed COSSs and after the changes described above for both the St.  
9 Louis County service territory and Outside of St. Louis County service territory. As shown,  
10 relocating some of the main data into the appropriate plant subaccounts moves some of the  
11 revenue increase burden to the Residential class but overall, this movement is not  
12 significant.

St. Louis County								
	Non						Rate F	
	Residential	Residential	Rate J	Rate B	Rate P	Public Fire	Private Fire	Total
Original Filing	\$ 235,875,115	\$ 66,901,977	\$ 11,767,278	\$ 4,747,670	\$ 6,621,483	\$ -	\$ 5,660,446	\$ 331,573,969
Revised	\$ 237,305,769	\$ 66,853,311	\$ 11,156,136	\$ 4,414,847	\$ 6,030,816	\$ -	\$ 5,813,090	\$ 331,573,969
Difference	\$ 1,430,654	\$ (48,666)	\$ (611,142)	\$ (332,823)	\$ (590,667)	\$ -	\$ 152,644	\$ -

Outside of St. Louis County								
	Non						Rate F	
	Residential	Residential	Rate J	Rate B	Rate P	Public Fire	Private Fire	Total
Original Filing	\$ 79,701,529	\$ 27,883,045	\$ 11,914,423	\$ 4,285,921	\$ 3,726,002	\$ -	\$ 4,418,647	\$ 131,929,568
Revised	\$ 80,154,134	\$ 27,879,759	\$ 11,545,244	\$ 4,172,126	\$ 3,597,164	\$ -	\$ 4,581,140	\$ 131,929,568
Difference	\$ 452,606	\$ (3,286)	\$ (369,179)	\$ (113,795)	\$ (128,838)	\$ -	\$ 162,493	\$ -

15 Q. Does this conclude your Rebuttal Testimony?

16 A. Yes.

Missouri-American Water Company

Class Cost of Service Study - Functional Allocators to Customer Class

Case No: WB-2022-0303, SB-2022-0304











Missouri-American Water Company  
Class Cost of Service Study - Account Detail  
Case No: WR-2022-0303, SR-2022-0304

**Missouri-American Water Company  
Class Cost of Service Study - Account Detail  
Case No: WR-2022-0303, SR-2022-0304**



Missouri-American Water Company  
 Class Cost of Service Study - Account Detail  
 Case No: WR-2022-0303, SR-2022-0304

	Post Test Year	Alloc	Description	Source of Supply	Pumping	Water Treatment	Transmission	Distribution	Storage	Meters	Services	Customers	Hydrants	Total	Variance
Miscellaneous T&D Operating Expense	\$ 1,578,087	1	\$ -	\$ -	\$ -	\$ -	\$ 101,553	\$ 971,846	\$ -	\$ 504,688	\$ -	\$ -	\$ -	\$ 1,578,087	1.00000
							0.06435	0.61584		0.31981		-	-		
Miscellaneous T&D Maintenance Expense	\$ 931,957	2	\$ -	\$ -	\$ -	\$ -	\$ 23,026	\$ 220,357	\$ -	\$ 128,120	\$ 311,864	\$ -	\$ 248,590	\$ 931,957	1.00000
							0.02471	0.23645		0.13747	0.33463		-	0.26674	
Fixed O&M	\$ 31,326,552	3	\$ -	\$ 1,068,841	\$ 2,171,593	\$ 6,585,318	\$ 749,178	\$ 7,169,519	\$ -	\$ 3,842,862	\$ 2,726,765	\$ 5,320,837	\$ 2,173,533	\$ 31,808,446	1.00000
				0.03360	0.06827	0.20703	0.02355	0.22540		0.12081	0.08572	0.16728	0.06833		
Labor	\$ 27,708,698	4	\$ -	\$ 285,178	\$ 1,690,742	\$ 4,526,860	\$ 464,709	\$ 4,447,195	\$ -	\$ 2,344,699	\$ 889,402	\$ 692,758	\$ 714,101	\$ 16,055,644	1.00000
				0.01776	0.10531	0.28195	0.02894	0.27699		0.14604	0.05539	0.04315	0.04448		
Net Plant	\$ 2,261,125,417	5	\$ -	\$ 22,045,612	\$ 82,742,622	\$ 230,487,422	\$ 371,278,831	\$ 1,140,690,807	\$ 9,223,269	\$ 189,765,057	\$ 107,855,775	\$ 23,170,803	\$ 82,767,639	\$ 2,260,027,835	1.00000
				0.00975	0.03661	0.10198	0.16428	0.50472	0.00408	0.08397	0.04772	0.01025	0.03662		
Rate Base	\$ 1,668,115,184	6	\$ -	\$ 18,634,818	\$ 69,647,221	\$ 194,096,208	\$ 296,607,659	\$ 762,428,297	\$ 7,937,385	\$ 155,126,718	\$ 79,619,460	\$ 18,833,447	\$ 65,183,971	\$ 1,668,115,184	1.00000
				0.01117	0.04175	0.11636	0.17781	0.45706	0.00476	0.09300	0.04773	0.01129	0.03908		
Variable Cost	\$ 20,435,288		\$ -	\$ 4,608,894	\$ 3,008,720	\$ 12,817,674	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,435,288	

**Missouri-American Water Company**  
**Cost of Service Study - Usage Statistics**  
**Case No: WR-2022-0303, SR-2022-0304**

	Residential	Non Residential	Rate J	Rate B	Contracts	Public Fire	Rate F	Total
Total Usage	230,200,596	76,083,359	32,593,962	16,156,639	24,293,869	-	522,754	379,851,179 hundred gallons
Average Day Usage	630,687	208,448	89,299	44,265	66,559	-	1,432	1,040,688 hundred gallons
Max Day Capacity Factor	1.97	2.09	1.38	1.24	1.26	-	-	---
Max Day Usage	1,242,453	435,655	123,265	54,888	83,864	93,091	26,909	2,060,125 hundred gallons
Extra Capacity	611,766	227,208	33,966	10,624	17,305	93,091	25,477	1,019,437 hundred gallons
Fire Allocator	-	-	-	-	-	0.7758	0.2242	1.0000 20,000 gpm for 10 hours
Distribution Multiplier	1.00	1.00	0.44	0.21	-	1.00	1.00	N/A
Average Hourly Usage	26,279	8,685	1,634	383	-	-	60	37,041 hundred gallons
Max Hour Capacity Factor	3.98	3.52	1.38	1.24	1.26	-	-	---
Max Hour Usage	104,589	30,572	2,256	475	-	13,964	4,036	155,892 hundred gallons
Extra Capacity	78,310	21,887	622	92	-	13,964	3,977	118,851 hundred gallons
Customers	322,445	17,860	135	4	2	-	7,480	347,926
Hydrants	-	-	-	-	-	32,467	38	32,505
Revenue	\$ 167,224,457	\$ 49,403,315	\$ 6,252,876	\$ 4,232,070	\$ 3,977,486	-	\$ 3,759,239	\$ 234,849,443

	Non	Rate F	Meter	Service					
	Residential	Residential	Rate J	Rate B	Rate P	Public Fire	Private Fire	Weighting	Weighting
5/8-METER	285,742	7,343	-	-	-	-	-	1.0	1.0
3/4-METER	24,390	3,049	-	-	-	-	-	1.5	1.0
1-METER	10,633	2,222	3	-	-	-	-	2.5	2.9
1.5-METER	757	1,111	-	-	-	-	-	5.0	4.0
2-METER	1,029	3,329	6	-	-	-	135	8.0	5.6
3-METER	21	306	3	-	-	-	1	16.0	5.6
4-METER	25	214	19	-	-	-	553	25.0	6.4
6-METER	24	204	20	-	-	-	2,291	50.0	9.9
8-METER	43	241	9	-	-	-	1,330	80.0	9.9
10-METER	3	57	7	-	-	-	33	115.0	9.9
12-METER	-	-	-	-	-	-	82	215.0	12.2
16-METER	-	-	-	-	-	-	-	320.0	12.2

**Missouri-American Water Company**  
**Cost of Service Study - Usage Statistics**  
**Case No: WR-2022-0303, SR-2022-0304**

System Load Factor:	0.5560	1,871,762 max day - thousand gallons per day	Average system hourly flow on max day
System Load Factor (fire):	0.5229	1,990,330 max day with fire - thousand gallons per day	Average system hourly flow on max day
System Load Factor (Hourly)	0.3738	99,083 max hour - thousand gallons per day	
System Load Factor (Hourly fire)	0.3165	117,023 max hour with fire - thousand gallons per day	

**Mains Statistics**

Type	Pct
Transmission	0.0946
Distribution	0.9054
Total	1.0000

**Storage Statistics**

Total Capacity	1,034,700	hundred gallons (2021 annual report)
Fire Allocation	0.1146	percentage of storage needed for maximum fire protection day
Non-Fire Allocation	0.8854	

**Missouri-American Water Company**  
**Cost of Service Study - Class Allocators**  
**Case No: WR-2022-0303, SR-2022-0304**

#### 1. VARIABLE COST

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total	Units
	Residential	Residential				Public Fire	Private Fire		
Total Usage	230,200,596	76,083,359	32,593,962	16,156,639	24,293,869	-	522,754	379,851,179	hundred gallons
<b>Allocator</b>	<b>0.6060</b>	<b>0.2003</b>	<b>0.0858</b>	<b>0.0425</b>	<b>0.0640</b>	-	<b>0.0014</b>	<b>1.0000</b>	

#### 2. BASE/EXTRA DAILY

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total	Units
	Residential	Residential				Public Fire	Private Fire		
Average Daily Use	630,687	208,448	89,299	44,265	66,559	-	1,432	1,040,688	hundred gallons
Extra Capacity	611,766	227,208	33,966	10,624	17,305			900,869	hundred gallons
System Capacity Factor	0.5560								
Average Day Allocator	0.3369	0.1114	0.0477	0.0236	0.0356	-	0.0008	0.5560	
Extra Capacity Allocator	0.3015	0.1120	0.0167	0.0052	0.0085	-	-	0.4440	
<b>Allocator</b>	<b>0.6385</b>	<b>0.2233</b>	<b>0.0644</b>	<b>0.0289</b>	<b>0.0441</b>	-	<b>0.0008</b>	<b>1.0000</b>	

#### 3. BASE/EXTRA DAILY (w FIRE PROTECTION)

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total	Units
	Residential	Residential				Public Fire	Private Fire		
Average Daily Use	630,687	208,448	89,299	44,265	66,559	-	1,432	1,040,688	hundred gallons
Extra Capacity	611,766	227,208	33,966	10,624	17,305	93,091	25,477	1,019,437	hundred gallons
System Capacity Factor	0.5229	assuming fire protection							
Average Day Allocator	0.3169	0.1047	0.0449	0.0222	0.0334	-	0.0007	0.5229	
Extra Capacity Allocator	0.2863	0.1063	0.0159	0.0050	0.0081	0.0436	0.0119	0.4771	
<b>Combined Allocator</b>	<b>0.6032</b>	<b>0.2111</b>	<b>0.0608</b>	<b>0.0272</b>	<b>0.0415</b>	<b>0.0436</b>	<b>0.0126</b>	<b>1.0000</b>	

#### 4. BASE/EXTRA HOURLY (w FIRE PROTECTION)

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total	Units
	Residential	Residential				Public Fire	Private Fire		
Average Hourly Use	26,279	8,685	1,634	383	-	-	60	37,041	hundred gallons
Extra Capacity	78,310	21,887	622	92	-	13,964	3,977	118,851	hundred gallons
System Capacity Factor	0.3165	assuming fire protection							
Average Day Allocator	0.2246	0.0742	0.0140	0.0033	-	-	0.0005	0.3165	
Extra Capacity Allocator	0.4503	0.1259	0.0036	0.0005	-	0.0803	0.0229	0.6835	
<b>Combined Allocator</b>	<b>0.6749</b>	<b>0.2001</b>	<b>0.0175</b>	<b>0.0038</b>	-	<b>0.0803</b>	<b>0.0234</b>	<b>1.0000</b>	

**Missouri-American Water Company**  
**Cost of Service Study - Class Allocators**  
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#### 5. STORAGE

Item	Residential	Non Residential				Rate F		Total	Units
			Rate J	Rate B	Rate P	Public Fire	Private Fire		
Average Hourly Use	26,279	8,685	3,721	1,844	2,773		60	43,362	
Extra Capacity	78,310	21,887	1,415	443	721		----	102,776	
Fire Allocator							1.00000	1.00000	
System Capacity Factor		0.3165 assuming fire protection							
Average Day Allocator	0.1918	0.0634	0.0272	0.0135	0.0202		0.0004	0.3165	
Extra Capacity Allocator	0.5208	0.1456	0.0094	0.0029	0.0048			0.6835	
Allocator	0.7126	0.2090	0.0366	0.0164	0.0250		0.0004	1.0000	
Non-Fire Allocation of Storage	0.88541								
Fire Allocaton of Storage	0.11459								
Non-Fire Allocator	0.6309	0.1850	0.0324	0.0145	0.0222	-	0.0004	0.8854	
Fire Allocator	-	-	-	-	-	-	0.1146	0.1146	
<b>Combined Allocator</b>	<b>0.6309</b>	<b>0.1850</b>	<b>0.0324</b>	<b>0.0145</b>	<b>0.0222</b>	<b>-</b>	<b>0.1150</b>	<b>1.0000</b>	

#### 6. MAINS

Item	Residential	Non Residential				Rate F		Total	Units
			Rate J	Rate B	Rate P	Public Fire	Private Fire		
Factor 4	0.6032	0.2111	0.0608	0.0272	0.0415	0.0436	0.0126	1.0000	hundred gallons
Factor 5	0.6749	0.2001	0.0175	0.0038	-	0.0803	0.0234	1.0000	hundred gallons
Transmission Weighting	0.0946		Average system hourly load						
Distribution Weighting	0.9054		Average system hourly load - max day with fire protection (incremental)						
<b>Combined Allocator</b>	<b>0.6681</b>	<b>0.2011</b>	<b>0.0216</b>	<b>0.0060</b>	<b>0.0039</b>	<b>0.0768</b>	<b>0.0224</b>	<b>1.0000</b>	

#### 7. HYDRANTS

Item	Residential	Non Residential				Rate F		Total	Units
			Rate J	Rate B	Rate P	Public Fire	Private Fire		
Total Hydrants	-	-	-	-	-	32,467	38	32,505	
<b>Allocator</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0.99883</b>	<b>0.00117</b>	<b>1.00000</b>	

**Missouri-American Water Company**  
**Cost of Service Study - Class Allocators**  
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#### 8. METERS

Item	Non		Rate J	Rate B	Rate P	Rate F		Total	Weighting
	Residential	Residential				Public Fire	Private Fire		
5/8-METER	285,742	7,343	-	-	-			293,085	1.0
3/4-METER	24,390	3,049	-	-	-			27,439	1.5
1-METER	10,633	2,222	3	-	-			12,858	2.5
1.5-METER	757	1,111	-	-	-			1,868	5.0
2-METER	1,029	3,329	6	-	-			4,364	8.0
3-METER	21	306	3	-	-			330	16.0
4-METER	25	214	19	-	-			258	25.0
6-METER	24	204	20	-	-			248	50.0
8-METER	43	241	9	-	-			293	80.0
10-METER	3	57	7	-	-			67	115.0
12-METER	-	-	-	-	-			-	215.0
16-METER	-	-	-	-	-			-	320.0
Total	366,877	95,959	3,104	-	-			465,940	-----
<b>Allocator</b>	<b>0.78739</b>	<b>0.20595</b>	<b>0.00666</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1.00000</b>	

#### 9. SERVICES

Item	Non		Rate J	Rate B	Rate P	Rate F		Total	Weighting
	Residential	Residential				Public Fire	Private Fire		
5/8-METER	285,742	7,343	-	-	-	-		293,085	1.0
3/4-METER	24,390	3,049	-	-	-	-		27,439	1.0
1-METER	10,633	2,222	3	-	-	-		12,858	2.9
1.5-METER	757	1,111	-	-	-	-		1,868	4.0
2-METER	1,029	3,329	6	-	-	135		4,499	5.6
3-METER	21	306	3	-	-	1		331	5.6
4-METER	25	214	19	-	-	553		811	6.4
6-METER	24	204	20	-	-	2,291		2,539	9.9
8-METER	43	241	9	-	-	1,330		1,624	9.9
10-METER	3	57	7	-	-	33		100	9.9
12-METER	-	-	-	-	-	82		82	12.2
16-METER	-	-	-	-	-	-		-	12.2
Total	351,118	47,906	537	-	-	41,525		441,086	-----
<b>Allocator</b>	<b>0.79603</b>	<b>0.10861</b>	<b>0.00122</b>	<b>-</b>	<b>-</b>	<b>0.09414</b>	<b>-</b>	<b>1.00000</b>	

#### 10. CUSTOMERS

Item	Non		Rate J	Rate B	Rate P	Rate F		Total
	Residential	Residential				Public Fire	Private Fire	
Total Customers	322,445	17,860	135	4	2			7,480
<b>Allocator</b>	<b>0.92676</b>	<b>0.05133</b>	<b>0.00039</b>	<b>0.00001</b>	<b>0.00001</b>	<b>0.02150</b>	<b>-</b>	<b>1.00000</b>

#### 11. METERED CUSTOMERS

**Missouri-American Water Company**  
**Cost of Service Study - Class Allocators**  
**Case No: WR-2022-0303, SR-2022-0304**

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total
	Residential	Residential				Public Fire	Private Fire	
Total Customers	322,445	17,860	135	4	2	7,480	347,926	
<b>Allocator</b>	<b>0.92676</b>	<b>0.05133</b>	<b>0.00039</b>	<b>0.00001</b>	<b>0.00001</b>	<b>0.02150</b>	<b>1.00000</b>	

**Missouri-American Water Company  
Cost of Service Study - Allocator Summary  
Case No: WR-2022-0303, SR-2022-0304**

Schedule WES-1R  
MAWC Class Cost of Service Study  
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**Missouri-American Water Company**

**Class Cost of Service Study - Functional Allocators to Customer Class**

**Case No: WR-2022-0303, SR-2022-0304**

	Functional COS	Alloc	Description	Non						Rate F			Variance
				Residential	Non Residential	Rate J	Rate B	Rate P	Public Fire	Private Fire	Total		
<b>Source of Supply Expense</b>													
Fixed	\$ 6,299,329	2	Base/Extra Daily	\$ 2,872,016	\$ 1,552,420	\$ 1,115,213	\$ 390,379	\$ 367,917	\$ -	\$ 1,384	\$ 6,299,329	\$ -	-
Variable	\$ 3,037,105	1	Total Usage	\$ 1,239,930	\$ 641,439	\$ 686,169	\$ 248,149	\$ 220,482	\$ -	\$ 936	\$ 3,037,105	\$ -	-
<b>Power and Pumping Expenses</b>													
Fixed	\$ 9,413,503	2	Base/Extra Daily	\$ 4,291,844	\$ 2,319,884	\$ 1,666,536	\$ 583,369	\$ 549,803	\$ -	\$ 2,068	\$ 9,413,503	\$ -	-
Variable	\$ 1,470,978	1	Total Usage	\$ 600,542	\$ 310,672	\$ 332,336	\$ 120,187	\$ 106,787	\$ -	\$ 454	\$ 1,470,978	\$ -	-
<b>Water Treatment</b>													
Fixed	\$ 24,223,558	2	Base/Extra Daily	\$ 11,044,105	\$ 5,969,704	\$ 4,288,460	\$ 1,501,172	\$ 1,414,795	\$ -	\$ 5,321	\$ 24,223,558	\$ -	-
Variable	\$ 4,260,614	1	Total Usage	\$ 1,739,440	\$ 899,845	\$ 962,595	\$ 348,116	\$ 309,304	\$ -	\$ 1,314	\$ 4,260,614	\$ -	-
<b>Transmission</b>	\$ 10,984,485	3	Base/Extra Daily w/ Fire	\$ 4,654,750	\$ 2,525,957	\$ 1,736,970	\$ 605,285	\$ 575,068	\$ 667,623	\$ 218,832	\$ 10,984,485	\$ -	-
<b>Distribution</b>	\$ 30,756,274	4	Base/Extra Hourly w/ Fire	\$ 13,506,882	\$ 6,072,540	\$ 166,227	\$ 272,616	\$ -	\$ 8,094,515	\$ 2,643,494	\$ 30,756,274	\$ -	-
<b>Storage</b>	\$ 3,856,328	5	Storage	\$ 2,133,413	\$ 945,721	\$ 146,098	\$ 44,854	\$ 52,854	\$ -	\$ 533,387	\$ 3,856,328	\$ -	-
<b>Meters</b>	\$ 14,263,415	8	Meters	\$ 11,838,849	\$ 2,190,634	\$ 190,467	\$ 43,465	\$ -	\$ -	\$ -	\$ 14,263,415	\$ -	-
<b>Services</b>	\$ 10,610,982	9	Services	\$ 7,995,193	\$ 1,641,727	\$ 54,647	\$ 13,508	\$ -	\$ -	\$ 905,906	\$ 10,610,982	\$ -	-
<b>Customers</b>	\$ 6,779,196	10	Customers	\$ 6,077,516	\$ 559,221	\$ 3,896	\$ 1,025	\$ 154	\$ -	\$ 137,383	\$ 6,779,196	\$ -	-
<b>Hydrants</b>	\$ 5,973,800	7	Hydrants	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,843,139	\$ 130,661	\$ 5,973,800	\$ -	-
<b>Total</b>	<b>\$ 131,929,567</b>			<b>\$ 67,994,479</b>	<b>\$ 25,629,765</b>	<b>\$ 11,349,615</b>	<b>\$ 4,172,126</b>	<b>\$ 3,597,164</b>	<b>\$ 14,605,278</b>	<b>\$ 4,581,140</b>	<b>\$ 131,929,567</b>	\$ -	-
				51.54%	19.43%	8.60%	3.16%	2.73%	11.07%	3.47%	100.00%		
Rate Year Water Revenue	\$ 84,624,643			\$ 48,975,492	\$ 21,037,197	\$ 9,050,666	\$ 3,006,411	\$ 1,113,066	\$ -	\$ 1,441,810	\$ 84,624,643	\$ -	-
Other Water Operating Revenues	\$ 1,665,284												
Increase	\$ 47,304,925			\$ 19,018,987	\$ 4,592,567	\$ 2,298,950	\$ 1,165,715	\$ 2,484,098	\$ 14,605,278	\$ 3,139,330	\$ 47,304,925	\$ 0	-
Percent Increase	55.9%			38.83%	21.83%	25.40%	38.77%	223.18%	0.00%	217.74%	55.90%		
Rate Year Revenue				\$ 48,975,492	\$ 21,037,197	\$ 9,050,666	\$ 3,006,411	\$ 1,113,066	\$ -	\$ 1,441,810	\$ 84,624,643		
Cost of Service Increase				\$ 19,018,987	\$ 4,592,567	\$ 2,298,950	\$ 1,165,715	\$ 2,484,098	\$ 14,605,278	\$ 3,139,330	\$ 47,304,925		
Allocation of Public Fire				\$ 12,159,655	\$ 2,249,995	\$ 195,628			\$ (14,605,278)	\$ -			
Revenue Target				\$ 80,154,134	\$ 27,879,759	\$ 11,545,244	\$ 4,172,126	\$ 3,597,164	\$ -	\$ 4,581,140	\$ 131,929,568		
Percent Increase				63.7%	32.5%	27.6%	38.8%	223.2%	0.0%	217.7%	55.9%		











Missouri-American Water Company  
Class Cost of Service Study - Account Detail  
Case No: WR-2022-0303, SR-2022-0304





Missouri-American Water Company  
Class Cost of Service Study - Account Detail  
Case No: WR-2022-0303, SR-2022-0304

	Post Test Year	Alloc	Description	Supply	Pumping	Treatment	Transmission	Distribution	Storage	Meters	Services	Customers	Hydrants	Total	Variance
Miscellaneous T&D Operating Expense	\$ 566,497	1	\$ -	\$ -	\$ -	\$ -	\$ 31,523	\$ 353,643	\$ -	\$ 181,331	\$ -	\$ -	\$ -	\$ 566,497	1.00000
Miscellaneous T&D Maintenance Expense	\$ 334,648	2	\$ -	\$ -	\$ -	\$ -	\$ 7,126	\$ 79,948	\$ -	\$ 46,250	\$ 112,349	\$ -	\$ 88,975	\$ 334,648	1.00000
Fixed O&M	\$ 12,740,860	3	\$ 478,188	\$ 763,157	\$ 2,637,961	\$ 256,641	\$ 2,879,117	\$ -	\$ 1,528,580	\$ 1,117,935	\$ 2,193,929	\$ 885,351	\$ 12,740,860	1.00000	
Labor	\$ 4,642,301	4	\$ 102,181	\$ 605,799	\$ 1,621,995	\$ 143,954	\$ 1,614,938	\$ -	\$ 841,037	\$ 319,356	\$ 248,218	\$ 255,326	\$ 5,752,804	1.00000	
Net Plant	\$ 820,183,286	5	\$ 41,836,927	\$ 51,876,214	\$ 120,424,531	\$ 100,497,593	\$ 276,158,331	\$ 33,768,545	\$ 77,723,019	\$ 73,047,395	\$ 12,193,945	\$ 32,656,785	\$ 820,183,286	1.00000	
Rate Base	\$ 627,060,523	6	\$ 38,370,602	\$ 47,171,462	\$ 109,296,492	\$ 84,193,411	\$ 161,749,565	\$ 31,051,295	\$ 69,723,102	\$ 47,271,141	\$ 10,939,584	\$ 27,293,871	\$ 627,060,523	1.00000	
Variable Cost	\$ 8,768,697		\$ 3,037,105	\$ 1,470,978	\$ 4,260,614	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,768,697	



**Missouri-American Water Company**  
**Cost of Service Study - Usage Statistics**  
**Case No: WR-2022-0303**

System Load Factor:	0.7124	532,488 max day - thousand gallons per day	Average system hourly flow on max day
System Load Factor (fire):	0.6277	604,371 max day with fire - thousand gallons per day	Average system hourly flow on max day
System Load Factor (Hourly)	0.1363	80,071 max hour - thousand gallons per day	
System Load Factor (Hourly fire)	0.1113	98,067 max hour with fire - thousand gallons per day	

**Mains Statistics**

Type	Pct
10-Inch and Larger	0.0818
Under 10-inch	0.9182
Total	1.0000

**Storage Statistics**

Total Capacity	519,817 hundred gallons (2021 annual report)
Fire Allocation	0.1383 percentage of storage needed for maximum fire protection day
Non-Fire Allocation	0.8617







**Missouri-American Water Company**  
**Cost of Service Study - Class Allocators**  
**Case No: WR-2022-0303, SR-2022-0304**

Item	Non Residential		Rate J	Rate B	Rate P	Rate F		Total
	Residential	Non Residential				Public Fire	Private Fire	
Total Customers	118,557	10,909	76	20	3		2,680	132,245
Allocator	0.89650	0.08249	0.00057	0.00015	0.00002		0.02027	1.00000

**Missouri-American Water Company  
Cost of Service Study - Allocator Summary  
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