

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

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

**STATEMENT OF POSITION OF
INTERVENOR CITY OF JOPLIN**

COMES NOW Intervenor City of Joplin, by and through, counsel and for its Statement of Position states as follows:

Corporate Cost Allocations: The City of Joplin believes that the appropriate basis for allocating MAWC's corporate administrative and general expenses to its various districts is by way of allocation factors that most directly reflect cost-causation in these administrative and general expenses. Joplin also holds the position that far greater disclosure and documentation of its corporate cost allocations should be required of MAWC.

Joplin True-Up Issue: Joplin's position is that there should be no true-up in a rate case, that any such true-up is inappropriate, unauthorized, and otherwise negates the concept of a test year. Instead of a true-up, there should be a fully adjusted test year using a six-month adjustment period. In the event that the Commission determines a true-up is appropriate, an issue which Joplin vigorously contests, the true-up period should be similarly no more than six months from the close of the test year.

Inter-District Support or Revenue Contribution: Joplin's position is that there should be no subsidy to any district and pure district specific pricing should be immediately implemented by the Commission.

Rates:

A) Commodity charge. Joplin's position is that MAWC has not demonstrated the appropriateness of its declining block rates, such that its commodity charges should be reset at a flat rate for all usage within a customer class.

B) Customer charge. Joplin's position is that MAWC's customer charges should be set at minimum levels consistent with achieving a reasonable level of revenue stability and predictability on an equivalent basis across customer classes and districts.

Phase In: Joplin believes that phase-in is both lawful and appropriate, as well as that any district which sustained a significant rate increase without phase-in in MAWC's last case and sustains a material rate increase in this case should be authorized phase-in.

Joplin has filed no testimony and generally takes no position on the remaining issues contained in the List of Issues; however, Joplin reserves the right to take any position on such issues at or after the hearing based upon the testimony and evidence at such hearing.

WHEREFORE, Intervenor City of Joplin submits this Statement of Position in the above-captioned matter..

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the above and foregoing were sent to each of the following persons via electronic mail, on this 23rd day of October, 2008:

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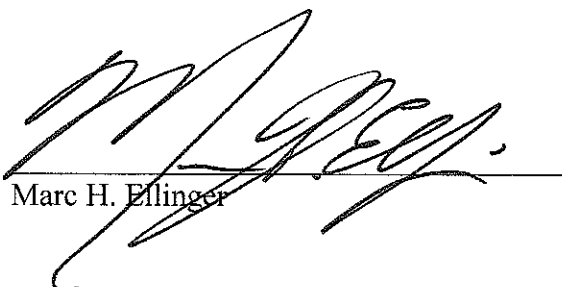
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