Exhibit No.:	
Issue(s):	Rate Design
Witness/Type of Exhibit:	Meisenheimer/Surrebuttal
Sponsoring Party:	Public Counsel
Casa No :	WR-2007-0216

SURREBUTTAL TESTIMONY

OF

BARBARA A. MEISENHEIMER

Submitted on Behalf of the Office of the Public Counsel

Missouri-American Water Company

Case No. WR-2007-0216

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company's request for Authority to Implement a General Rate Increase for Water Service provided in Missouri Service Areas))) WR-2007-0216)	
AFFIDAVIT OF BARBARA A. MEISENHEIMER		
STATE OF MISSOURI) COUNTY OF COLE)	SS	
Barbara A. Meisenheimer, of lawful age and	d being first duly sworn, deposes and states:	
1. My name is Barbara A. Meiser of the Public Counsel.	nheimer. I am the Chief Utility Economist for the Office	
2. Attached hereto and made a pa	rt hereof for all purposes is my surrebuttal testimony.	
3. I hereby swear and affirm that true and correct to the best of n	my statements contained in the attached testimony are my knowledge and belief.	
	Barbara A. Meisenheimer	
Subscribed and sworn to me this 31st day of My Commission Expires February 4, 2011 Cole County Commission #07004782 My commission expires February 4, 2011.	Kendelle R. Stratton, Notary Public	

OF

BARBARA A. MEISENHEIMER

MISSOURI-AMERICAN WATER COMPANY

CASE NO. WR-2007-0216

O. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADD	DRESS.
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A. Barbara Meisenheimer, Chief Economist, Office of the Public Counsel, P. O. Box2230, Jefferson City, Missouri 65102.

Q. HAVE YOU TESTIFIED PREVIOUSLY IN THIS CASE?

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A. Yes, I submitted direct testimony on district and class rate design for the Missouri American Water Company (MAWC or the Company) on June 12, 2007, and rebuttal testimony on July 13, 2007.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to provide Office of the Public Counsel (OPC or Public Counsel)'s final rate design proposal and to respond to the Company's rebuttal testimony.

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Q. PLEASE SUMMARIZE THE RATE DESIGN PROPOSAL CONTAINED IN YOUR REBUTTAL TESTIMONY.

A. Public Counsel generally supports district revenues to be aligned with district costs; however, the deficiency for Brunswick and Warren County is too significant to accomplish movement to full cost of service in this case. In order to make a significant movement toward cost of service while mitigating rate shock, the district increase for Brunswick and Warren County should be set at the highest percentage increase experienced by any other district. Recovery from other districts should be based on district specific revenue requirements with the exceptions that the subsidy needed to cover Brunswick's under-collection be collected from St. Louis and the subsidy needed to cover Warren County's undercollection be collected from St. Charles. Within districts, the customer charge and volumetric rate elements should be adjusted by an equal percent with the exception that Public Counsel would not oppose creating uniform block rates for the St. Joseph district provided that the block adjustments are made in the manner described in my rebuttal testimony.

Q. HAS YOUR CLASS RATE DESIGN PRPOSAL CHANGED BASED ON THE CLASS COST OF SERVICE STUDY FILED IN THE COMPANY'S REBUTTAL TESTIMONY?

A. No. The Company's CCOS study results indicate that generally current class revenues are aligned with class costs so there is no need for significant shifts in class revenue responsibility within districts.

Q. PLEASE RESPOND TO THE COMPANY'S PROPOSAL TO CONSOLIDATE THE ST. LOUIS AND ST. CHARLES DISTRICTS.

A. Public Counsel cannot support this proposal without further assurance that the proposal will not adversely affect residential and small commercial customers in St. Charles and St. Louis. While Public Counsel is generally not opposed to consolidating interconnected systems such as St. Louis and St. Charles, the differences in rate classes and the method of recovery for infrastructure replacements in St. Louis adds a level of complexity to consolidation.

The Company proposal to consolidate the St. Louis and St. Charles districts is incomplete in that it fails to explain how the existing rate classes will be combined or the customer impacts resulting from consolidating rate elements. For example, currently, St. Charles has distinct Residential and Commercial rate classes while St. Louis has a Rate A which includes both. The Rate A customer charges for smaller meters in St. Louis is lower than for St. Charles. The volumetric charge is the same regardless of use for the St. Louis district while in St. Charles the customer charge for smaller meters is higher and the volumetric charges vary according to a four block structure. The individual customer impacts that might result from consolidation of these differing rate structures are unknown at this time.

Additionally, the Company uses an ISRS mechanism that allows it to collect, in advance of a rate proceeding, a portion of the replacement costs incurred for St. Louis County. Currently, the Company only has authority to impose the ISRS for St. Louis County. However, when new rates are set, the ISRS charge is reset to zero and rates are adjusted to collect the prudently incurred return on rate base

WR-2007-0216 Surrebuttal Testimony of Barbara A. Meisenheimer

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and expenses associated with those infrastructure replacements. If the districts are consolidated resulting in uniform rates, then following a rate case, St. Charles customers would pay a portion of the cost associated with St. Louis infrastructure replacements. The benefit to the Company of the advanced recovery associated with the ISRS coupled with the consolidation of St. Louis and St. Charles may give the Company additional incentive and perceived justification for seeking the legislative authority to impose a similar ISRS mechanism on St. Charles.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.