BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

In the Matter of the Petition of Missouri-American Water Company for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment ("WSIRA").

Case Nos. WO-2021-0428 Tariff File No. YW-2022-0049

Staff's Reply

COMES NOW the Staff of the Missouri Public Service Commission, and for its *Reply* to Missouri-American Water Company's *Response to Staff Recommendation and OPC Objection and Recommendation,* states herein as follows:

1. On September 3, 2021, Missouri-American Water Company ("MAWC") filed its *Petition for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment (WSIRA) and Motion for Approval of Customer Notice* ("*Petition*") pursuant to the provisions of the Missouri Water and Sewer Infrastructure Act, §§ 393.1500 and 393.1509, RSMo., and Commission Rule 20 CSR 4240-2.060(1). This WSIRA concerns the actual WSIRA eligible investment placed in service from January 1, 2021, through October 31, 2021.

2. On December 2, 2021, Staff filed its *Recommendation* and the Office of Public Counsel ("OPC") filed its *Objection*.

3. On December 13, 2021, MAWC filed its *Response* to Staff and OPC.

4. After negotiations, MAWC and Staff now agree that WSIRA rates should be designed to recover annual WSIRA revenues of \$16,135,000 for St. Louis water, \$2,659,795 for All Other water, \$42,491 for Arnold sewer, and \$165,495 for All Other sewer for a total of \$19,002,781. The calculation of these amounts is found on **Revised Appendix C** attached to MAWC's *Response*.

WHEREFORE, Staff joins MAWC in requesting that the Commission approve the WSIRA surcharge revenues identified herein, subject to the changes to the tariff sheets and customer notice found in **Revised Appendix A**, **Revised Appendix B**, and **Revised Appendix K** attached to MAWC's *Response*; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

<u>/s/ Kevin A. Thompson</u> **KEVIN A. THOMPSON** Missouri Bar Number 36288 Chief Staff Counsel

Missouri Public Service Commission Post Office Box 360 Jefferson City, Missouri 65102 (573) 751-6514 Voice (573) 526-6969 FAX kevin.thompson@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission.

Certificate of Service

I certify that a true and correct copy of the foregoing was served electronically or by First Class United States Mail, postage prepaid, upon all parties according to the Service List maintained by the Commission's Data Center **on this 28th day of December**, **2021.**

/s/ Kevin A. Thompson