

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

In the Matter of the Joint Application of)
Missouri-American Water Company and)
Spokane Highlands Water Company for)
MAWC to Acquire Certain Water Assets) File No. WM-2018-0104
Of Spokane Highlands and, in)
Connection Therewith,)
Certain Other Related Transactions.)

RESPONSE TO STAFF RECOMMENDATION AND MEMORANDUM

COMES NOW Missouri-American Water Company (MAWC or Company)), and, as its Motion for Leave to Amend Application, states as follows to the Missouri Public Service Commission’s (Commission):

1. On October 24, 2017, MAWC filed an *Application and Motion for Waiver* seeking approval for Spokane Highlands to sell, and MAWC to purchase, substantially all of the water assets of Spokane, including the transfer to MAWC of the Certificate of Convenience and Necessity currently held by Spokane.

2. On January 22, 2017, the Staff of the Commission (Staff) filed a Staff Recommendation and an associated Memorandum, wherein it recommended approval of the Application with conditions described both in the Staff Recommendation (para. 6.a. – t., p. 2-5) and in the Memorandum (recommendations 1-20, p. 7-8)

3. MAWC has no objection to Staff Recommendation conditions 6.a. – l. and 6.o. – t. (recommendations 1-12 and 15-20).

4. MAWC does object to Staff Recommendation conditions 6.m. and 6.n., which state as follows:

m. Order MAWC to develop and implement, or continue to maintain any existing allocation process already implemented, with the review and assistance of Staff if necessary, a comprehensive allocation procedure to allocate costs and investments

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ATTORNEYS FOR
MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, or U.S. Mail, postage prepaid, on January 30, 2018, to the following:

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