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Exhibit No. 25

MAWC – Exhibit 25 Charles B. Rea Direct Testimony File No. WR-2022-0303

Exhibit No.: Issues:	Rate Design, Affordability, Total Sales and System Delivery, Declining
	Usage, Total Revenues, and Revenue
	Stability Mechanism (Policy)
Witness:	Charles B. Rea
Exhibit Type:	Direct
Sponsoring Party:	Missouri-American Water Company
Case No.:	WR-2022-0303
	SR-2022-0304
Date:	July 1, 2022

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2022-0303 CASE NO. SR-2022-0304

DIRECT TESTIMONY

OF

CHARLES B. REA

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

AFFIDAVIT

I, Charles B. Rea, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am Senior Regulatory, Rates & 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.

Charles B. Rea

Charles B. Rea

July 1, 2022 Dated

DIRECT TESTIMONY CHARLES B. REA MISSOURI-AMERICAN WATER COMPANY CASE NO. WR-2022-0303 CASE NO. SR-2022-0304

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DIRECT TESTIMONY

CHARLES B. REA

I. INTRODUCTION

1	Q.	Please state your name and business address.
2	A.	My name is Charles B. Rea. My business address is 5201 Grand Avenue, Davenport, IA
3		52801.
4	Q.	By whom are you employed and in what capacity?
5	A.	I am employed by the American Water Works Service Company, Inc. ("AWWSC"). My
6		title is Senior Director, Rates & Regulatory.
7	Q.	Please summarize your educational background and business experience.
8	A.	I received a Bachelor of Arts degree in Computer Science from the University of Illinois
9		at Springfield in 1986 and a Master of Science degree in Statistics and Operations Research
10		from Southern Illinois University at Edwardsville in 1990.
11		I have been employed by AWWSC since January 2018 in my role as Senior
12		Director, Rates and Regulatory. Previous to my employment with AWWSC, I was
13		employed by MidAmerican Energy Company from June 1990 through January 2018. I
14		have more than thirty years of utility experience covering a wide range of issues including
15		electric system planning, sales and revenue forecasting, electric load research, marketing,
16		rates, class cost of service, and energy efficiency. Most recently at MidAmerican, I was
17		Director, Energy Efficiency and Regulatory Analytics. In that position, I had responsibility
18		for planning, evaluation, and operational management of MidAmerican's energy efficiency
19		and demand response programs in Illinois, Iowa, and South Dakota, as well as direct
20		responsibility for electric and natural gas sales and revenue forecasting, electric peak

demand forecasting, load research, retail pricing of electric and natural gas products, and
 electric and natural gas cost of service and rate design.

3 Q. What are your current employment responsibilities?

4 My primary responsibility in my role as Senior Director, Rates and Regulatory is to serve A. 5 as a subject matter expert on rate design, revenue, and affordability of service issues for 6 AWWSC's operating company affiliates, including Missouri-American Water Company 7 ("MAWC" or the "Company"). I am responsible for the development and preparation of 8 rate design analyses and filings, as well as rate design proposals to our internal and external 9 stakeholders. I am also responsible for projections of revenues for rate case purposes, and 10 I am responsible for developing and presenting information on the affordability of our 11 water and wastewater service to our customers.

12

2 Q. Have you previously testified before a regulatory body?

13 A. Yes. During my employment with AWWSC, I have provided testimony regarding the cost 14 of service, rate design proposals, revenue projections, and affordability analyses for New Jersey-American Water Company, Virginia-American Water Company, Pennsylvania-15 16 American Water Company, Maryland-American Water Company, West Virginia-17 American Water Company, Iowa-American Water Company, Missouri-American Water 18 Company, Indiana-American Water Company, and Illinois-American Water Company. I 19 also have testified on numerous occasions in Iowa, Illinois, and South Dakota on issues 20 regarding energy efficiency and electric and natural gas cost of service and rate design.

21

Q. What is the purpose of your Direct Testimony in this proceeding?

A. The purpose of my Direct Testimony is to sponsor MAWC's rate design proposals,
 affordability analyses, revenue projections including adjustments to MAWC's historical

1		billing determinants, and the policy reasons supporting MAWC's proposed Revenue
2		Stabilization Mechanism ("RSM"). Specifically, I will address the following issues:
3		- Rate Design
4		- Affordability
5		- Analysis of MAWC Water Consumption
6		- Revenue Calculations
7		- Revenue Stabilization Mechanism (Policy)
8	Q.	Please identify the schedules you will be sponsoring and for which you will be
9		providing testimony.
10	A.	I am sponsoring the following Company Schedules attached to my Direct Testimony:
11		- Schedule CBR-1: Water Rate Design
12		- Schedule CBR-2: Wastewater Rate Design
13		- Schedule CBR-3: Water Affordability Analysis
14		- Schedule CBR-4: Residential Usage Analysis
15		- Schedule CBR-5: Commercial Usage Analysis
16		- Schedule CBR-6: Public Authority Usage Analysis
17		- Schedule CBR-7: NARUC Resolution
18		II. RATE DESIGN
19	Q.	Please discuss some of the important guiding principles associated with sound rate
20		design.
21	А.	There are a number of important principles that pricing analysts and policy makers consider
22		when developing appropriate rate design mechanisms for retail water and sewer service:
23		- Cost Basis: An important goal of rate design is to develop prices for water service

1to retail customers that are intended to recover the Company's approved revenue2requirement and that reflect the cost of providing service to retail customers. Cost3of service results inform pricing decisions and guide how rates should be set such4that each customer class contributes to the revenue requirement commensurate with5their cost to serve. Company witness Wesley Selinger presents the Company's cost6of service studies in this case.

7 **Revenue Stability:** Rates should be designed in a way that provides revenue 8 stability to the utility and that can be reasonably expected to recover the utility's 9 revenue requirement over the long run. Consistent recovery of the approved 10 revenue requirement through well-designed rates helps the utility to prudently 11 manage and invest in the water delivery system, while poor rate design decisions can hamper the utility's ability to make investments, operate, and maintain the 12 13 water delivery system in a manner consistent with the long-term interest of its 14 customers.

Efficiency of Use: Rates should be designed to encourage the efficient use of water
 resources by customers. The volumetric charges for water service should
 appropriately reflect the variable cost of providing water service while also
 providing customers an appropriate incentive to conserve water and manage their
 bills. Rates should communicate to customers the full cost of providing water
 service.

Gradualism: Changes in rate design should be made in a manner that avoids
 inappropriate levels of rate shock. Rate shock can come both from general increases
 in revenues that can affect all customers and from changes in rate designs that can

1	cause large increases to specific pockets of customers. Drastic changes in rates can
2	cause customer confusion and dissatisfaction and have adverse effects on the
3	utility's ability to provide quality customer service.

- Avoidance of Discrimination: Rates should not unduly discriminate between
 particular customer groups or provide different price signals to similarly situated
 customers taking similar services from the utility.
- Simplicity and Feasibility: Rate designs should be relatively simple and easy to
 understand and easy to communicate, manage, and should result in bills that are
 clear and understandable.

10 Q. Please describe the Company's current rate design for water service.

A. MAWC's current rate design for water service primarily consists of a two-part rate design
that features a flat volumetric rate (in most cases) with a monthly fixed charge that varies
with the size of the meter.

14 Q. Does the Company have different pricing structures in different geographic 15 locations?

- 16 A. Yes. Currently, rates are split into two primary pricing districts:
- 17 St. Louis County
- 18 Non-St. Louis County

19 Q. Please describe the rate structures currently in place for St. Louis County and non-

- 20 St. Louis County customers.
- A. The Company offers the following rates to St. Louis County and non-St. Louis County
 customers:

1	- Rate A: Rate A is a volumetric rate with fixed monthly charges for residential and
2	most non-residential customers.
3	- Rate J: Rate J is a volumetric rate with fixed monthly charges for certain customer
4	types defined as large water users. This rate applies to:
5	- customers using more than 450,000 gallons per month, where
6	- usage is fairly constant throughout the year (language per tariff), and
7	- usage is not for residential, irrigation, or construction use.
8	In every month, the amount of water billed to each customer under Rate J is the
9	maximum of a) 450,000 gallons, b) the customer's actual metered use for the
10	month, or c) 60% of the customer's highest summer period monthly use in the
11	twelve months before the current month's billing. Customers are removed from the
12	rate for a period of twelve months if their monthly metered usage falls below
13	450,000 gallons per month twice during a twelve-month period.
14	- Rate B: Rate B is a volumetric rate with fixed monthly charges for customers that
15	are sales for resale customers.
16	For all of the above rates, the monthly meter charges are the same. The volumetric charges
17	are lower for St. Louis County customers than for other customers for Rate A and Rate J,
18	but are identical for Rate B. In addition, the Company has an inclining block rate
19	structure in its Mexico service territory for residential customers, where volumetric prices
20	increase as the amount of water purchased every month increases (the "Pilot Program").
21	The Company's volumetric rates for Rates A, B, and J, as well as the inclining block rate
22	structure for Mexico is shown below.

	St. Louis	
Volumetric Rates	County	Other
Rate A	\$0.56290	\$0.62469
Rate J	\$0.17797	\$0.28268
Rate B	\$0.26194	\$0.26194

	Volumetric
Mexico Inclining Block	Rate
1 st 3,000 gal. per month	\$0.57266
Next 7,000 gal. per month	\$0.71583
Over 10,000 gal. per month	\$0.79027

1 Q. Does the Company offer rates for fire protection service to St. Louis County and non-

2

St. Louis County customers?

3 Yes. The Company offers private fire protection service to all districts under Rate F. This A. rate provides for monthly service charges by size of service and provides for monthly 4 5 charges for private fire hydrants. Monthly service fees and hydrant fees are the same for all customers. Volumetric charges for water used for private fire service are charged at the 6 7 applicable rate for Rate Schedule A. The Company does not charge separate rates for 8 public fire protection service. Public fire protection costs are reallocated back to general 9 service customer classes in the Company's water service rate design and are recovered 10 through general service rates.

11

Q. Does MAWC have any customers on special contract rates?

A. Yes. MAWC has two large industrial customers on special contract rates with separate
 volumetric rates specific to those customers. In addition, there are three Sales for Resale
 customers that take service under special contract rates. In total, these customers account
 for approximately \$3.6 million in revenue.

Q. What changes is the Company proposing to make to its rate design for water service in this case?

A. The Company is not proposing any significant changes to its water service rate design in
this case other than to propose the elimination of the inclining block rate Pilot Program in
Mexico and return Mexico residential rates to the standard Rate A offering for non-St.
Louis County customers. Also, the Company is proposing to equalize volumetric rates for
Rate A between St. Louis County and non-St. Louis County customers and to move
volumetric rates for St. Louis County and non-St. Louis County customers closer together
in the Rate J offering.

10 Q. Please describe the Mexico inclining block Pilot Program.

11 A. The Mexico inclining block Pilot Program was approved by the Commission through the 12 Stipulation and Agreement Regarding Inclining Block Pilot Program filed jointly by the 13 Company, the Staff of the Missouri Public Service Commission, and the Missouri Division 14 of Energy in Case No. WR-2017-0285 ("the Stipulation") with rates taking effect on May 15 28, 2018. The purpose of the Pilot Program was to determine if residential customers in 16 the Mexico service territory that previously took service at a rate that was the same 17 regardless of how much water they used would modify their monthly consumption pattern 18 in response to a rate design that charges more for water as they use more water. To aid the 19 effort to encourage customers to use less water in response to the inclining block rate, the 20 Stipulation allowed for water conservation kits to be offered at no charge to residential 21 customers participating in the Pilot Program. In Case No. WR-2020-0344, the Commission 22 ordered a change in the inclining block rate structure to increase the price differentials 23 between the steps that results in the volumetric rates I outlined earlier in my testimony.

Q. Why is the Company proposing to eliminate the inclining block rate Pilot Program in
 Mexico and return Mexico residential rates to the standard Rate A offering for non St. Louis County customers?

4 A. An analysis of usage data going back to the beginning of the Pilot Program has failed to 5 demonstrate any significant changes in usage over time either in total or between the three 6 different usage blocks in the Pilot Program. In addition, the Mexico service territory is one 7 of the least seasonal areas the Company serves in terms of the amount of seasonal non-8 discretionary water usage and is one of the lowest income areas served by the Company as 9 shown in the Company's affordability analysis discussed in detail later in Section III of my 10 testimony. Also, the largest residential customer in Mexico that uses the most water in the 11 over 10,000 gallons per month block is a master-metered apartment complex where the 12 ability of individual tenants to change water consumption in response to price changes may 13 be minimal or non-existent. These facts, coupled with the non-response of water usage 14 after implementation of the inclining block rate structure, suggest that it is unlikely there 15 will be significant changes in residential water consumption patterns in response to an 16 inclining block rate structure in Mexico absent more dramatic changes in the rate structure. 17 For these reasons, the Company is proposing to eliminate the inclining block rate Pilot 18 Program in Mexico and return Mexico residential rates to the standard Rate A offering for 19 non-St. Louis County customers.

Q. Why is the Company proposing for the St. Louis County and non-St. Louis County groups to equalize the volumetric rates for Rate A and to move the volumetric rates for Rate J closer together?

A. The Company is proposing to equalize the volumetric rates for Rate A between St. Louis

1 County and non-St. Louis County customers to complete the process of single tariff pricing 2 for those rates that the Commission has considered over the last two rate cases. It is 3 noteworthy that volumetric rates for these groups are nearly identical today, so moving 4 these rates to a single statewide rate does not impose significant additional rate increases 5 or rate shock for either of these groups of customers. The Company is also proposing to 6 move Rate J rates closer together by increasing Rate J for St. Louis County customers by 7 200% of the increase for non-St. Louis County customers. This is also an attempt to move 8 closer to single tariff pricing for these customers while recognizing the significant 9 differences in those rates that currently exist.

10Q.In Case No. WR-2020-0344, the Company proposed significant changes to the Rate J11service offering, proposing to create a new large user rate and a transitional rate for12customers that would not have been eligible for the new large user rate. Those13changes were not included in the settlement agreement concluding that case. Is the14Company proposing any changes to the Rate J offering in this case?

A. No. The Company is not proposing any significant changes to its Rate J offering in this
case, other than movement in volumetric rates for St. Louis County and non-St. Louis
County that I described earlier in this testimony.

Q. Monthly meter charges are the same for all customers regardless of the rate schedule
 under which they take service with the exception of fire service. Is the Company
 proposing to change the monthly meter charges in this case?

A. Yes. The Company is proposing to increase the 5/8" monthly meter charge from \$9.00 per
 month to \$12.00 per month, which is a 33% increase and is still less than the 5/8" monthly
 meter charges supported in the class cost of service studies provided in the Direct

1		Testimony of Company witness Mr. Selinger. Percentage increases for meter charges for
2		meters larger than 5/8" are also approximately 33%.
3	Q.	What acquisitions are included in the Company's water rate design and how are they
4		treated?
5	A.	As explained in the Direct Testimony of Company witness Brian LaGrand, the Company
6		is including the following acquisitions that are anticipated to close by the end of 2022 in
7		its revenue requirements and in its proposed rate design:
8		- Eureka
9		- Monsees Lake
10		- Purcell
11		- Stewartsville
12		- Smithton
13		The Monsees Lake, Purcell, Stewartsville, and Smithton acquisitions are all included in the
14		non-St. Louis County rate design for both present rates and proposed rates. The Eureka
15		acquisition is included in present rates and proposed rates under the St. Louis County rate
16		design.
17	Q.	Please describe how the Company is proposing to allocate its proposed revenue
18		increase for water service to its customer classes.
19	A.	The Company is proposing to allocate its proposed increase in water service revenues
20		according to the following guidelines:
21		- Increases to Rate J in total are capped at 150% of the overall water revenue increase
22		requested in this case to bring those customers gradually toward cost of service.

1		- Increases to Private Fire rates likewise are capped at 150% of the overall water
2		revenue increase requested in this case to bring those customers gradually toward
3		cost of service.
4		- Rate B proposed revenues are set at cost of service.
5		- The remaining revenue requirement, after calculation of specific contract rates, is
6		spread to Rate A customers by increasing the volumetric rate for Rate A.
7	Q.	Do you have a schedule that provides the Company's complete proposed rate design
8		in this case?
9	A.	Yes. Schedule CBR-1 provides the Company's proposed rate design, which is based on
10		the current rate design as modified by the proposals discussed above.
11	Q.	Please describe the Company's current rate design for wastewater service.
12	A.	The Company currently offers wastewater service under five different rate schedules
13		applicable to five different wastewater districts:
14		- Tariff RT 1.1 (Arnold)
15		- Tariff RT 2.1 (Various communities)
16		- Tariff RT 3.1 (Various communities)
17		- Tariff RT 3.2 (Taos)
18		- Tariff RT 4.1 (Hallsville)
19		The Arnold tariff consists of a monthly flat fee of \$37.23 per month for all customers plus
20		a volumetric charge of \$7.140 per thousand gallons for usage above 5,000 gallons per
21		month. Tariffs RT 2.1 and RT 3.1 both offer a flat fee for residential customers (\$61.64
22		per month for RT 2.1 and \$44.03 per month for RT 3.1) and a graduated monthly charge
23		by meter size for commercial customers with a volumetric charge for commercial

1		customers that applies to all usage above 6,000 gallons per month. Tariff RT 3.2 applicable
2		to customers in Taos consists of a \$65.00 per month flat fee for all customers. Tariff RT
3		4.1 applicable to customers in Hallsville consists of a \$38.750 per month flat fee for all
4		residential customers and a bifurcated flat fee of either \$48.75 or \$159.75 depending on
5		usage.
6	Q.	Is the Company proposing to make any significant changes to its rate design for
7		wastewater service?
8	A.	No.
9	Q.	Is the Company proposing to collect its entire proposed wastewater service revenue
10	-	requirement through its wastewater rates?
11	A.	Yes. The Company is proposing to recover its entire proposed wastewater revenue
12		requirement through wastewater rates and does not propose any recovery of wastewater
13		revenue requirements through its water service rates.
14	Q.	What acquisitions are the Company including in its water rate design and how are
15		those acquisitions treated?
16	A.	The Company is including the same acquisitions for wastewater service as it is for water
17		service as I have previously described in my testimony, which are:
18		- Eureka
19		- Monsees Lake
20		- Purcell
21		- Stewartsville
22		- Smithton
23		The Monsees Lake acquisition is included in present rate revenues under their current rate,

1		which is a flat unmetered fee of \$58.00 per customer per month. The Purcell acquisition
2		is included in present rate revenues and proposed rates under Tariff Schedule 2.1. The
3		Eureka, Stewartsville and Smithton acquisitions are all included in present rates revenues
4		and proposed rates under Tariff Schedule 3.1.
5	Q.	Do you have a schedule that provides the Company's complete proposed rate design
6		for wastewater service in this case?
7	A.	Yes. Schedule CBR-2 provides the Company's proposed rate design for wastewater
8		service.
9		III. AFFORDABILITY
10	Q.	How would you define affordable water and wastewater service?
11	А.	The concept of affordability for water and wastewater service is based on the idea that
12		everyone should have access to drinking water and wastewater service that is: (1) safe,
13		meaning it complies with EPA regulations and Safe Drinking Water Act standards; (2)
14		reliable, so that it is resilient in the face of floods, droughts, and other climate risks; and
15		(3) affordable. An assessment of affordability generally compares monthly or annual bills
16		for water or wastewater service to measures of household income.
17	Q.	How can one assess the affordability of water and wastewater service and what
18		information is needed to complete such an assessment?
19	A.	A common way to assess affordability is to compare annual bills for water and/or
20		wastewater service to some measure of household income in the communities that the
21		utility serves. Such an assessment requires two data points – the average monthly or annual
22		bill for water and wastewater service and some measure of household income for the target
23		customer population. For the broader residential customer base, the most common

household income measure is Median Household Income ("MHI"), which can be measured
at a community level and is paired with a data set that provides the number of customers
served in each community to arrive at a weighted number that represents MHI for the
Company's entire service territory. Alternative measures of income, such as disposable
income or hours of labor at minimum wage needed to cover the cost of water and/or
wastewater service have also been suggested.¹

When an appropriate measure (or measures) of household income is determined,
affordability can then be assessed for the average customer, low-income customers, and a
full range of households based on their various income levels and bills for water and/or
wastewater service. A variety of household income data is readily and publicly available
from the U.S. Census Bureau through the American Community Survey ("ACS") at the
state, county, and community levels.

Q. What can different measures of affordability for water and wastewater service expressed as a percentage of MHI tell you?

A. Assessing affordability information of water and wastewater service for the entire MAWC residential customer population can tell you whether customers in general are having or would have difficulty paying their water bills under the Company's current or proposed tariff structure. Assessing affordability information of water and wastewater service for lower-income customers can tell you the number of customers that may be having trouble paying their utility bills, where the customers are located in the Company's service territory, and the extent to which those bills are causing customers economic distress. This

¹ Teodoro, Manuel P. "Measuring Household Affordability for Water and Sewer Utilities." Journal AWWA, 2018, doi:10.5942/jawwa.2018.110.0002

1		can, in turn, inform the utility about the size and scope of low-income assistance programs
2		that may be needed to help these vulnerable customers better afford water and wastewater
3		service, both in terms of rate design proposals and customer assistance programs that may
4		include customer grants, tariff discounts, levelized billing, and outreach programs.
5	Q.	Have you completed an affordability study regarding bills that would arise from
6		proposed rates in this case?
7	A.	Yes. My affordability study for water service is provided in Schedule CBR-3
8	Q.	What information does your affordability study provide?
9	A.	My affordability study is actually two different analyses and provides two basic types of
10		information. This information includes:
11		• Historical comparisons of average monthly bills to MHI are shown in actual terms and
12		shown in terms of Bill-to-Income ("BTI") Ratio, which is defined as annual water bills
13		divided by estimated annual household income.
14		• Current information on the estimated number of customers in the service territory, and
15		estimated BTI Ratios for various income levels stated in terms of household income
16		and multiples of the Federal Poverty Level ("FPL"). BTI Ratios are calculated for
17		proposed rates in this case.
18	Q.	What is the result of your historical comparison of average monthly water bills to
19		median household income in the MAWC service territory?
20	А.	The charts below compare historical average monthly water bills to MHI for Missouri-
21		American customers from 2012 through 2021 stated in absolute terms and stated in terms
22		of BTI Ratio, along with estimated average monthly bills under the Company's proposed

1rates in this case and estimated MHI for Missouri-American customers during 2023. The2data shows that the BTI Ratios for water service for Missouri-American customers have3held steady from 2012 to 2021 generally between 0.5% and 0.6%, meaning that on average4MAWC's customers in total have steadily paid between 0.5% and 0.6% of their household5income over the last 10 years for water service from Missouri-American. Based on the6Company's proposed rates in this case, MAWC expects the BTI Ratio for water service in72023 to be 0.79%.





1 Q. What conclusions can you draw from these historical comparisons?

A. The charts above show that average residential monthly bills have risen at approximately
the same rate from 2010 to 2021 as median household income has risen for customers. This
results in a BTI Ratio that has remained steady over that timeframe within a range of 0.50%
to 0.65%. Under the Company's proposed rates, the BTI Ratio in 2023 is expected to be
0.79%.

Q. Is there a generally accepted standard for the affordability of water and wastewater expressed as a percentage of MHI?

9 A. A benchmark for affordability expressed as a total bill's percentage of MHI is a policy
10 decision; however, bills less than 2.0% or 2.5% of MHI for water and 4.0% to 4.5% of
11 MHI for combined water/wastewater are considered "affordable" by some.² An
12 affordability benchmark for water service of 3.0% to 4.5% of household income has also

² Teodoro, Manuel P. "Measuring Household Affordability for Water and Sewer Utilities." Journal AWWA, 2018, doi:10.5942/jawwa.2018.110.0002.

- 1 been proposed specifically for lower-income groups.³
- Q. What impact does the Company's proposed rate design have on the affordability of
 the Company's water service in this case?
- A. As shown above, the affordability of MAWC's residential water service has been and is
 expected to remain affordable under the Company's proposed rates in this case.
- Q. What information can support a more focused assessment of affordability of water
 service for the Company's most vulnerable customers?
- A. A more focused assessment of affordability targeted at the Company's more vulnerable
 customers can compare annualized bills for "basic water service" (i.e., service that is
 necessary and reasonable to meet basic household needs for drinking, cooking, sanitation,
 and general health service that does not include seasonal discretionary water use) to
 measures of household income for lower-income groups. A more focused affordability
 assessment requires a much more detailed information set that includes:
- 14 <u>1. Standard measure of what constitutes low-income customers</u>

Typically, a standard measure of income for lower-income centers around various multiples of the FPL, which is set by the federal government and varies depending on the number of persons in the household. For the calendar year 2020, 100% of FPL for a threeperson household in the lower 48 states was \$21,720 per year. Multiples of FPL can then be used to set low-income benchmarks (50% of FPL, 150% of FPL, 200% of FPL, etc.). It is important to note that FPL is both a function of income and the number of persons in the

³ Colton, R. (2020). The Affordability of Water and Wastewater Service in Twelve U.S. Cities: A Social, Business and Environmental Concern prepared for The Guardian (U.S. Office). New York NY. https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation.

household, so the estimation of the number of households at different levels of FPL is more
 complicated than simply understanding income level.

3 <u>2. Number of households in the service territory that qualify as low-income customers</u>

4 The number of households that fall within different levels of income or different intervals of FPL can best be found through the previously mentioned U.S. Census Bureau data, 5 6 which provides this information at a community level. As previously stated, this data can 7 be paired with a data set that provides the number of customers served by community to 8 determine the estimated percentage of households at different income levels in the service 9 territory. The number of customers at different multiples of FPL can also be estimated by 10 pairing households at different income levels in the service territory with the number of 11 persons per household by income level, which is also available through U.S. Census 12 Bureau data.

13 *3. Number of low-income households that are customers of the utility*

14 The number of low-income households in a service territory does not necessarily equate to 15 the number of low-income customers of the utility, because lower-income customers are 16 more likely to rent and less likely to own homes than higher-income customers. Water and 17 wastewater service provided to apartment buildings and other multifamily housing units 18 are often in the name of the building owner, and tenants are generally not the utility 19 customers of multifamily housing units. To determine the number of low-income 20 households that are actually low-income customers of the utility, one needs to determine 21 a) the level of home ownership in the community by income level, and b) the percentage 22 of renters in a community that rent single-family homes (for which those renters are likely 23 the paying customer of record) versus renters that live in apartment buildings and other

1 multifamily units.

2

4. Common understanding of what constitutes basic water service

3 When looking at the appropriate usage levels to determine affordability for lower-income 4 groups, it is not appropriate to rely solely on average usage levels for a residential customer class in total. A better approach is to identify a usage level that reflects water consumption 5 6 provided for basic human services (cooking, cleaning, sanitation, and general health 7 requirements), which is then assumed to be constant from month-to-month and not subject 8 to significant seasonality or weather conditions. This standard can be expressed in terms 9 of gallons per resident per day. An advantage of this approach is that a basic water service 10 metric stated in terms of gallons per resident can be paired with the fact that lower-income 11 households tend to have lower occupancy rates in terms of persons per household. This 12 information, which is available from U.S. Census Bureau data, can be used to customize a 13 level of usage that accurately reflects basic water service for lower-income households.

14 An alternative approach to the more focused affordability assessment described 15 above is to look at individual customer billing records and identify a median monthly water 16 consumption for all customers with relatively flat non-seasonal usage across the year. The 17 use of a median statistic in this case reduces the impact of very high usage customers. 18 Another alternative is to choose a consecutive period of time during the year (February 19 through April for example) that tends to have the lowest average use per customer over the 20 course of the year and has the least amount of discretionary seasonal water usage, if any at 21 all. This method helps to ensure that the monthly usage used in an affordability analysis 22 represents the least amount of discretionary water use, and therefore is most representative 23 of basic water usage in a given service territory.

Q. What does the affordability study show in terms of the estimated number of
 customers in Missouri by household income and how bills for basic water service
 compare for these customers in terms of BTI Ratios?

A. Charts 3 and 4 below show the estimated number of customers by multiples of FPL for the
Company's residential customers and the BTI Ratios for bills for basic water service for
each income group under the Company's proposed rates in this case.





1		For most of our customers, BTI Ratios are less than 2% for basic water service at the
2		Company's proposed rates. The Company estimates that there are approximately 62,000
3		residential water customers with household incomes at or below 150% of FPL, which
4		represents approximately 14% of the Company's residential water customer base. For
5		these customers, the average BTI Ratio is approximately 2.5% for Basic Water Service,
6		which we define to be 40 gallons of water per household per day.
7	Q.	If you are able to discern the affordability of water service for an average customer,
8		are you able to discern the affordability of water service at differing levels of income?
9	A.	Yes, we are.
10	Q.	Please describe the analysis that estimates the Company's residential customer
11		population for different levels of income.
12	А.	The United States Census Bureau, through ACS, provides detailed information at the zip
13		code level on the number of households, both those that own homes and those that rent, at
14		different levels of income. From that data:
15		• We develop for each zip code an estimated profile of households that are customers
16		of the Company by income level (\$0k to \$5k annual income, \$5k - \$10k, etc.)
17		• Within each increment of income, we can estimate the number of households with
18		one person, two persons, etc. that can then yield estimates of the number of
19		customers in each zip code by multiple of FPL.
20		• We can then calculate bills for basic water service for each combination of
21		household income and household size based on the rates applicable to that location
22		and estimate BTI Ratios for each combination of household income, household
23		size, and multiple of FPL within each zip code.

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1		• This information can then be rolled up to any aggregated level, which might be at
2		a county level, district level, tariff group, or for the service territory in total.
3	Q.	What conclusions do you draw based on the Company's affordability study?
4	A.	There are three conclusions that can be drawn from Company's affordability study:
5		• The affordability of the Company's water service has remained steady from 2010
6		through the present time, with a modest uptick expected overall in 2023 under the
7		Company's proposed rates.
8		• The Company's water service has been, is, and is expected to continue to be
9		affordable for the vast majority of its residential customers, including under the
10		final rates proposed in this case.
11		• There are groups of customers for whom affordability of water service may be an
12		issue.
13	Q.	Is the affordability of the Company's water service uniform across all of the areas the
14		Company serves?
15	A.	No, it is not. Both bills and household income vary significantly across the Company's
16		service territory. The Company has a very diverse service territory and serves customers
17		in urban, suburban, and rural communities with household incomes that range from well
18		over \$150,000 MHI in parts of St. Louis County to as low as \$45,000 in Mexico and less
19		than \$40,000 in other parts of the Missouri service territory. The Company's water
20		affordability analysis is provided in Schedule CBR-3. These exhibits provide a breakdown
21		by community of the number of customers served in each community, the median

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community.

2		IV. ANALYSIS OF MAWC WATER CONSUMPTION
3	Q.	Are there revenue adjustments the Company is proposing in this case that require a
4		quantitative analysis of water consumption by MAWC's customers?
5	A.	Yes. I will explain the modeling used to develop the revenue forecasts for residential,
6		commercial and public authorities ("OPA") customers, and thereafter, I will discuss the
7		development of the revenue projections for all customer classes (residential, commercial,
8		industrial, OPA, and sales for resale). For residential, commercial, and OPA customers,
9		the Company is proposing adjustments for the normalization of the actual billing
10		determinants for the 12-month period ended June 2022, related to trends in declining use,
11		weather normalization, and the impact of the COVID-19 public health emergency on water
12		consumption for MAWC's water customers. These adjustments require the Company to
13		analyze water consumption and determine (1) if there is a significant and pervasive rate of
14		decline in water use per customer over time, (2) if there are significant relationships
15		between water consumption and weather conditions in the Company's service territory,
16		and if weather was different from normal in the 12-month period ended June 2022, and if
17		so, a weather normalization adjustment to usage is appropriate to reflect more normal
18		weather conditions for the 12-month period ended May 2023, and (3) if the COVID-19
19		public health emergency has had a significant impact on water consumption for MAWC's
20		customers, to determine if a COVID-related adjustment to usage is appropriate for the 12-
21		month period ended May 2023.
	0	

Q. How do you determine the parameters and relationships necessary to analyze declining water use, weather impacts on water consumption, and the impact of

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COVID-19 on water consumption for MAWC's customers?

A. The parameters and relationships necessary to analyze declining use, weather, and COVID 19 on water consumption for MAWC's customers are estimated using statistical linear
 regression modeling.

5

Q. What is a statistical linear regression model?

A. Statistical linear regression modeling is a commonly used type of mathematical predictive
analysis. The overall idea of regression modeling is to examine two things: (1) does a set
of independent explanatory variables do a good job of predicting an outcome (dependent)
variable, and (2) which independent explanatory variables, in particular, are significant
predictors of the dependent variable, and in what way do they help predict the results of
the dependent variable.

12 There are three major uses for statistical linear regression analysis. These major 13 uses are: (1) determining the predictive power of independent explanatory variables; (2) 14 forecasting the effect that independent variables have on a dependent variable; and (3) trend forecasting. First, the regression analysis can be used to identify the strength of the effect 15 16 that independent explanatory variables have on a dependent variable. A typical question is: 17 "What is the strength of the relationship between summer heat, precipitation, and water sales?" Second, the regression analysis can be used to forecast the effects or impacts of 18 19 changes. That is, the regression analysis helps us understand how much the dependent 20 variable changes with a change in one or more of the independent variables. A typical 21 question is: "How much water sales can the Company expect to lose for each inch of 22 rainfall above normal in any given period?" Third, regression analysis can predict trends and future values. The regression analysis can be used to get point estimates of future 23

values of the dependent variable based on assumed values for the independent variables.
 A typical question can be: "Given current trends in water sales, what can we expect water
 sales to be each month next year assuming normal weather?"

4

Q. What does a statistical model produce?

A. A statistical linear regression analysis is a way of mathematically validating which
independent variables have a significant impact on the dependent variable – the main
factor, the one you are trying to better understand or predict. A statistical linear regression
model produces an equation that describes a historical relationship between a set of
independent variables and a single dependent variable that can be used to forecast future
values of the dependent variable based on assumed values of the independent variables. An
example of such an equation is shown below:

12
$$UPCn = a0 + (a1 x RAINn) + (a2 x CDDn) +$$

13
$$+(a3 \times \text{COVID-19n}) + (a4 \times \text{TIMEn})$$

14	Where:	UPCn =	Use per customer in month n
15		RAINn =	Rainfall in month n
16		CDDn =	Cooling Degree Days ("CDD") in month n
17		COVIDn =	COVID-19 effect in month n (0% to 100%)
18		TIMEn =	Year/Month for month n
19	and:	a0 =	constant term
20		a1 =	coefficient for RAIN
21		a2 =	coefficient for CDD
22		a3 =	coefficient for COVID-19 impact per customer
23		a4 =	coefficient for TIME (declining use value)

1		In this example, use per customer is the dependent variable (outcome) and all other
2		variables are independent variables (predictors).
3	Q.	Can statistical linear regression models be used to weather normalize historical water
4		sales for different customer classes?
5	A.	Yes. In the statistical model in the example above, the a1 coefficient for RAIN can be used
6		to estimate the impact of rainfall on use per customer in any given historical period and
7		estimate the impact of what use per customer would have been if rainfall had been different,
8		especially when actual precipitation was higher or lower than normal. Below is a sample
9		calculation of how weather normalization works with a statistical regression model that
10		uses the weather as a strong predictive independent variable that affects the use per
11		customer dependent variable.
12		IMPACTn = a1 x (ACTUAL RAINn – NORMAL RAINn)
13		Where:IMPACTn = Weather impact due to abnormal rainfall in period n
14		ACTUAL RAINn = Actual Rainfall (in inches) in period n
15		NORMAL RAINn = Average Rainfall (in inches) in period n
16		If the value of the a1 coefficient for rainfall is -0.30 in this example, actual rainfall for the
17		period is 6 inches and normal rainfall for the period is 4 inches, the weather impact for the
18		period due to higher-than-normal rainfall is a negative 600 gallons per customer meaning
19		that the Company sold 600 fewer gallons per customer of water than it otherwise would
20		have $[-0.30 \times (6 - 4) = -0.60]$. If there are multiple weather variables in the statistical
21		regression analysis, this calculation is completed separately for each variable and the sum
22		of the calculations is rolled up into a single weather impact. This approach to weather
23		normalization allows an analyst to independently assess the impact of each weather

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component, and also allows an analyst to state the weather impacts over time both in terms of consumption and in terms of revenues by multiplying the consumption impact by a volumetric price.

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0. Can statistical linear regression models be used to estimate the impacts of COVID-19 5 on water sales for different customer classes?

6 Yes. In the statistical model example above, the a3 coefficient for COVID-19 is the 7 estimate of the impact of the COVID-19 public health emergency on monthly use per 8 customer. The historical data set contains a variable for each month that indicates the 9 assumed qualitative level impact of COVID-19 in that month. In all months prior to April 10 2020, that value was set at 0%. From April 2020 on, that value is set at 100% when 11 maximum COVID-19 impacts are observed, or at a level less than 100% where we see reduced COVID-19 impacts on usage. The coefficient for the COVID-19 impact variable 12 13 estimates the average monthly use per customer based on the months that have been 14 designated as COVID-19 months. This coefficient can then be used to (1) identify a normal 15 level of usage that is not influenced by the impact of COVID-19, in a manner similar to a normalization calculation that adjusts for the influence on water usage associated with 16 17 weather conditions that depart from normal, and (2) reflect estimates of future impacts of 18 the COVID-19 public health emergency.

19 **Q**. Can these models be used to estimate trends in declining use per customer for 20 different customer classes?

21 A. Yes. In the same statistical model example represented above, the a5 coefficient for TIME 22 is the estimate of declining use per customer per month. This coefficient measures the rate 23 of decline in use per customer over the historical data set independent of the effect of any

other variable in the model. The historical data set contains a variable for each month which is a timestamp that starts at 1 for the first month in the dataset and increases by 1 for every month going forward. This acts as a trend variable for both historical periods in the dataset and future forecast periods. The coefficient for this trend variable is applied to future increasing values of the trend which results in decreasing forecasts of use per customer.

7

Q. How does one assess the accuracy of a statistical linear regression model?

8 A. A statistical linear regression model produces a set of statistics that can be used to judge 9 the accuracy and fitness of the model. The most common statistics are (1) the "R-Squared" 10 value, which is a statistical measure in a regression model that determines the proportion 11 of variance in the dependent variable that can be explained by the independent variables, 12 and (2) values and standard deviations for the coefficients, which can be used to determine "t-statistics" and "p-values" which tell how accurately and precisely the different 13 14 coefficients are being calculated and whether the associated independent variables are 15 strong predictors of the dependent variable.

In the equation described above, the "R-Squared" value is a statistic that measures the percentage of variation from time period to time period in the dependent variable (water use per customer) that is explained by the mathematical relationship with the independent variables. The R-Squared can range from 0% (no explanatory ability) to 100% (perfect explanatory accuracy). In general, the higher the R-squared, the better the predictive value of the model.

22 The second major test involves comparisons of the values of each of the model 23 coefficients and their associated standard errors. Because a statistical regression model estimates an explanatory relationship between a dependent variable and a set of independent variables, there will always be some degree of uncertainty around what that explanatory relationship actually is. As a result, each model coefficient has a level of uncertainty around it, and this level of uncertainty is represented by measuring how many standard errors each coefficient is away from zero, which the model also calculates.

6 Dividing the value of each coefficient by its standard error yields a t-statistic which 7 can be used to judge the predictive power of the independent variable that the coefficient 8 represents. For example, in the case of the generic statistical model described above, if the 9 value of the a1 coefficient for rainfall is -0.30 and the standard error for that coefficient is 10 0.05 (meaning that the real value of the coefficient could be anywhere between -0.35 and 11 -0.25 with -0.30 being the most likely value), the value of the t-statistic is -6.0 (-0.30 12 divided by 0.05 = 6.0). Generally speaking, t-statistic values greater than 2.0 for positive 13 coefficients or less than -2.0 for negative coefficients indicate an acceptable predictive 14 relationship between that independent variable and the dependent variable of interest. The 15 higher the t-statistic value, the greater the confidence we have in the coefficient as a 16 predictor. Values between 2.0 and -2.0 indicate that the predictive power of that 17 independent variable may not be very strong.

Q. Are there other more qualitative ways to determine whether a statistical linear
 regression model is accurate and produces reasonable results?

A. Yes. There are also several qualitative ways to determine whether a statistical regression
 model accurately describes the relationship that a chosen set of independent variables has
 with the dependent variable:

1 **Does the model represent reality?** If it is generally known that water consumption • 2 is seasonal and is driven in the summertime by heat and precipitation, it is logical 3 to assume that a statistical model that attempts to describe and predict seasonal 4 water consumption would have explanatory variables related to summer heat and 5 precipitation, and those explanatory variables would be shown to have a strong predictive value in the model. Models that attempt to accurately describe the 6 7 drivers behind water consumption that do not contain statistically significant 8 coefficients for independent variables that are logically known to drive water 9 consumption are likely not strong predictive models.

- Are the signs of the coefficients for major independent variables correct? If
 water consumption increases in the summertime with increasing heat and decreases
 in the summertime with increasing precipitation, it is logical to expect that the
 coefficients for the independent variables that represent summertime heat and
 summertime precipitation would be positive and negative, respectively.
- 15 • Is the model based on a robust data set? It is easy for a statistical model with 16 many independent variables and relatively few observations of the dependent 17 variable to accurately explain variation in the dependent variable, but that does not 18 mean that the model has strong predictive power if the data set being analyzed is 19 small in scope. A statistical model that attempts to describe water consumption that has good predictive explanatory power over multiple years of monthly historical 20 21 data is very useful and accurate in projecting future trends and in explaining how 22 changes in strong predictive independent variables will affect levels of the 23 dependent variable.
1 Do the impacts on the dependent variable that the model describes make • 2 **logical sense?** It is possible outside of a statistical linear regression model to make 3 ballpark estimates of other facts like the impact of COVID-19 on water consumption and long-term trends in declining use. This can be done with a simple 4 5 linear plot of annual usage data by year. For example, if a linear plot of annual usage data suggests that there is a downward trend of approximately 1,000 gallons 6 7 per customer per year, one would expect that a statistical model that is measuring 8 that impact would yield a result that is similar. The same is true when looking at 9 the potential impacts of COVID-19 on water consumption. If a visual examination 10 of data suggests that water use per customer for a commercial class has decreased 11 by 2,000 gallons per customer in 2020 due to the COVID-19 emergency, it is 12 logical to expect a statistical regression model that attempts to statistically measure 13 that impact to yield estimates consistent with that expectation.

14 V. DECLINING USE AND WEATHER ADJUSTMENTS

Q. Please describe the statistical linear regression model you are using to analyze water consumption data for MAWC.

A. In this proceeding, we are using multiple regression statistical models to analyze use per
customer for the residential, commercial, and OPA classes that relate the dependent
variable (i.e., water use per customer) to a collection of independent variables. Separate
models are developed for St. Louis County customer usage and usage for non-St. Louis
County customers. The models use 120 months of monthly data beginning in April 2012
and running through March 2022. Each regression model uses independent variables that

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can be broken down into four categories to explain monthly use per customer. The four categories are:

- 3 Weather: The weather variables used in the models are Cooling Degree Days ("CDDs") and precipitation. These weather variables are a weighted average of 4 5 current month and lagged month weather readings taken by the National Oceanic and Atmospheric Administration at St. Louis Lambert International Airport. This 6 7 weighted average lagged approach is used to account for the differences between 8 billing month sales and calendar month weather. Coefficients from these variables 9 show the impact of weather on monthly use per customer over the 10-year period. 10 Weather variables are modeled as monthly deviations from normal for each month 11 in the data set (actual weather for the month less normal weather for the month for each individual weather variable). Normal weather is calculated for each month of 12 13 the year based on the weather over the ten-year period that the historical data spans. 14 **Time:** The time variable is a trending variable that notes the passage of time in the 15 model and produces a coefficient that estimates the monthly decline in usage per 16 customer over the 10-year model. The time variable captures the range of 17 conservation efforts that have been implemented by customers over time, such as the installation of more water-efficient fixtures and appliances. Time on its own is 18 19 of no consequence, but it is a powerful variable because it is the medium for 20 capturing the conservation effect. 21 • **COVID-19 indicator**: The COVID-19 indicator variable is set at 0% for months
- prior to April 2020 and 100% for the months of April 2020 through December 2021.
 The effect of this variable in the model is to look specifically for increases or

1decreases in use per customer for the April 2020 through December 2021 timeframe2that may have happened due to systemic changes in the amounts of water customers3use as a result of the COVID-19 public health emergency.

Monthly indicators: The monthly indicator variables in the model measure
 structural monthly and/or seasonal changes in use per customer that cannot be
 explained by any of the other variables in the model.

Q. What information do these models provide that is useful for developing pro forma
adjustments to revenues that you are sponsoring in your testimony?

- 9 A. Each model produces a set of weather coefficients that can be used to weather-normalize
 10 historical sales, a coefficient that indicates the monthly trend in declining use per customer
 11 for each class, and a coefficient that shows for each class the average use per customer
 12 impact associated with changes in usage due to COVID-19.
- Q. You mentioned that you have developed models for customer usage relating to the
 residential, commercial, and OPA classes. Are you also modeling usage for the
 industrial and sales for resale customer classes, and for fire service classes?
- A. No. The statistical modeling in this case is only for the residential, commercial, and OPA
 classes. Usage estimates for the industrial and sales for resale classes are developed using
 a simple multi-year average and are described later in the revenue section of my testimony.
- 19 Q. Is this modeling approach different from the modeling approaches that have been
 20 used by the Company in previous rate cases in Missouri?
- A. Yes. The modeling approach proposed in this case is a monthly model with 12 monthly
 data points for each of the 10 years covered in the model, which results in models with
 120 historical data points. Modeling approaches in previous rate cases relied on ten years

of data but used an annual modeling approach where there was only one data point for each
 year which resulted in models with 10 historical data points.

Q. Why is the Company proposing to move from an annual model with one data point for each year to a monthly model with 120 historical data points?

A. The Company is moving to a monthly modeling approach to improve the accuracy of the
modeling process. Monthly modeling that incorporates monthly weather information and
that allows for monitoring of customer usage from month to month significantly improves
the Company's ability to understand the impacts of weather on customer usage.
Additionally, this approach allows for a more detailed analysis of other factors that affect
customer usage like the COVID-19 emergency. This approach to modeling significantly
improves the accuracy of the Company's analysis of customer usage.

Q. You previously discussed the various statistical tests used for accuracy and predictability. Please discuss the results of these tests for your models and why they are appropriate to use in this proceeding.

15 As shown in Schedules CBR-4, CBR-5, and CBR-6, the Adjusted R-Squared statistics for A. 16 the residential usage model is 87% and 89% for St. Louis County and non-St. Louis County 17 customers respectively, the Adjusted R-Squared statistic for the commercial usage model 18 is 92% and 89% for St. Louis County and non-St. Louis County customers respectively, 19 and the Adjusted R-Squared statistic for the OPA model is 85% and 80% for St. Louis 20 County and non-St. Louis County customers respectively. This indicates that in all models, 21 the explanatory variables (weather, COVID-19 impacts, declining use, etc.) strongly 22 explain the variability in use per customer over time. The values of the coefficients,

- 1 standard errors, and t-statistics for the major explanatory variables in the models are as
- 2 follows:

St. Louis County								
Residential Model Major		Standard						
Explanatory Variables	Coefficient	Error	t-Statistic					
Declining Use Trend	0096	.0024	-4.0971					
Precipitation	2360	.0570	-4.1401					
CDD	.0017	.0017	1.0271					
COVID-19 Impact	.1309	.2062	.6349					

Non-St. Louis County Residential Model Major		Standard	
Explanatory Variables	Coefficient	Error	t-Statistic
Declining Use Trend	0082	.0015	-5.6620
Precipitation	2358	.0388	-6.0778
CDD	.0064	.0011	5.8139
COVID-19 Impact	.3305	.1270	2.6030

St. Louis County								
Commercial Model Major		Standard						
Explanatory Variables	Coefficient	Error	t-Statistic					
Declining Use Trend	0104	.0135	7686					
Precipitation	-1.3041	.2534	-5.1457					
CDD	.0430	.0109	3.9349					
COVID-19 Impact	-3.4180	1.1809	-2.8945					

Non-St. Louis County								
Commercial Model Major		Standard						
Explanatory Variables	Coefficient	Error	t-Statistic					
Declining Use Trend	.0077	.0064	1.2068					
Precipitation	5815	.1321	-4.4005					
CDD	.0234	.0054	4.3045					
COVID-19 Impact	6231	.5496	-1.1337					

St. Louis County OPA Model Major Explanatory Variables	Coefficient	Standard Error				
Declining Use Trend	.0134	.0413	.3252			
Precipitation	-2.9459	.8847	-3.4877			
CDD	.1287	.0343	3.7572			
COVID-19 Impact	-6.5469	3.6182	-1.8094			

Non-St. Louis County OPA Model Major Explanatory		Standard	
Variables	Coefficient	Error	t-Statistic
Declining Use Trend	0175	.0214	8191
Precipitation	-1.9477	.4889	-3.9838
CDD	.0325	.0190	1.7095
COVID-19 Impact	-3.7743	1.8691	-2.0193

1 Apart from the declining usage variables (which I discuss later in my testimony), the 2 statistics for the individual explanatory independent variables above show a high degree of 3 explanatory power with most parameters having t-statistics all outside of the +/- 2.00 range. 4 Signs for the precipitation variables are all negative as expected, meaning that more rainfall 5 over a summer period results in less seasonal water usage from our residential customers. 6 Signs for the CDD variables are positive, which indicates that the hotter the weather gets 7 in the summer, customers use more water, which is expected, and the COVID-19 impact 8 variables generally indicate that residential usage went up as a result of COVID-19 and 9 usage for commercial and OPA customers went down.

10 Q. Your regression models show a trend of declining use per customer. What is the 11 amount of declining use your models have identified?

A. The annual amount of declining use identified for residential customers is approximately
 1,400 gallons per year per customer for St. Louis County customers and 1,200 gallons per
 year for customers outside of St. Louis County. The annual amount of declining use

identified for commercial customers is approximately 1,500 gallons per year per customer
for St. Louis County with a gain of approximately 1,100 gallons per year for customers
outside of St. Louis County. The annual amount of declining use identified for OPA
customers is approximately 2,000 gallons per year per customer for OPA customers in St.
Louis County and 2,500 gallons per year for non-St. Louis County customers.

6 Q. Are these declining usage trends you have identified significant?

A. For residential customers, these declining usage trends are statistically significant as I have
outlined in my discussion of the levels and significance of the declining use model statistics
previously in my testimony. For commercial and OPA customers these trends are not
statistically significant, and therefore we do not propose to include any declining use
adjustment for commercial and OPA customers in this proceeding and instead use a fiveyear average of use per customer as I describe later in my testimony.

Q. Why do you believe that declining use is a valid trend for residential customers that will continue?

A. Consumption patterns for the Company's customers are similar to those for other American
Water operating companies which have experienced a decline in residential consumption
per customer averaging approximately -2.0% per year over the last 10 years. According to
the 2010 Water Research Foundation report, "many water utilities across the United States
and elsewhere are experiencing declining water sales among households." The report
further states: "A pervasive decline in household consumption has been determined at the
national and regional levels."⁴

22 Q. What is causing the decline in residential customers' usage?

⁴ Coomes, Paul et al., North America Residential Water Usage Trends Since 1992 – Project #4031, page 1 (Water Research Foundation, 2010).

A. Several factors drive the decline in residential customers' usage. These factors include the
 incremental introduction of low-flow fixtures and appliances, new regulations that lead to
 further reductions in fixture flow rates, conservation programs, and public initiatives that
 have led to greater consumer water conservation awareness.

5 Plumbing fixtures such as toilets, showerheads, and faucets available to consumers 6 today are more water-efficient than were those fixtures manufactured in the past. Similarly, 7 appliances such as dishwashers and washing machines are also more water efficient. When 8 a customer replaces an older toilet, washing machine, or dishwasher with a new unit, the 9 new unit will almost certainly use less water than the one it replaced. Similarly, the 10 construction of new homes results in the installation of water-efficient fixtures meeting 11 new, more efficient, regulatory standards.

12 Q. How much water do the new fixtures and appliances save?

13 The Energy Policy Act of 1992 mandated the manufacture of water-efficient toilets, A. 14 showerheads, and faucet fixtures. For example, a toilet manufactured after 1994 must use 15 no more than 1.6 gallons per flush, compared to a pre-1994 toilet, which typically used 16 from 3.5 to 7 gallons per flush. In fact, toilets using only 1.28 gallons per flush or less are 17 becoming more prevalent in the marketplace. Replacing an old toilet with a new one, 18 therefore, can save from 2 to nearly 6 gallons per flush. The United States Environmental 19 Protection Agency estimates that there are more than 220 million toilets in the United 20 States and that approximately 10 million new toilets are sold each year for installation in 21 new homes and businesses or replacement of aging fixtures in existing homes and 22 businesses.

1		The Energy Independence & Security Act of 2007, which established stringent						
2		efficiency standards for dishwashers and washing machines, has further reduced indoor						
3		water consumption. Dishwashers manufactured after 2009 and washing machines						
4		manufactured after 2010 must use 54% and 30% less water, respectively. All other factors						
5		being equal, a typical residential household in a new home constructed in 2015, with water-						
6		efficient toilets, washing machines, dishwashers, and other fixtures, uses approximately						
7		35% less water for indoor purposes than a non-retrofitted home built prior to 1994.						
8	Q.	Are there other factors contributing to the continued decline in water consumption						
9		patterns?						
10	A.	Yes. Programs to raise customer awareness and interest in the benefits of conserving water						
11		and energy continue to increase. As awareness of water and energy efficiency increases,						
12		customers may decide to replace a fixture or appliance even before it has broken.						
13		Additionally, customers may further reduce consumption by changing their household						
14		water use habits in other various ways.						
15	Q.	Do you expect the trend of declining customer usage to continue in the future?						
16	A.	Yes. Water-efficient fixtures and other drivers such as conservation education and						
17		government-mandated standards will continue to drive further efficiency into residential						
18		and nonresidential usage per customer. In fact, the trend is well established and continues						
19		to affect water usage on the MAWC system as well as most water utilities across the United						
20		States. The rate of the continued trend is dependent on the pace of fixture replacement						
21		within the Company's footprint as well as the broadening acceptance of a conservation						
22		ethic through raised customer and business awareness programs, government conservation						
23		policy, and similar behavior modification-related programs.						

1 Technology is now available for newer, more water-efficient products that further 2 improve on Energy Policy Act levels, and there has been a growing movement to codify 3 these more stringent specifications. The introduction of progressive code modifications – 4 such as the International Code Council's International Green Construction Code and the 5 International Association of Plumbing and Mechanical Officials Green Plumbing and 6 Mechanical Code Supplement (2011) – support uniform implementation of increased water 7 efficiency standards. An article in the June 2012 issue of the American Water Works 8 Association ("AWWA") Journal entitled "Insights into declining single-family residential 9 water demands" recognizes this decline in water consumption: "[r]educed residential 10 demand is a cornerstone of future urban water resource management. Great progress has 11 been made in the last 15 years and the industry appears poised to realize further demand 12 reductions in the future."⁵ The trend of declining water consumption based on improved 13 water efficiency has continued over time.

Q. Normalizing historical usage for weather and the COVID-19 emergency, what has the overall trend been for use per customer for the residential, commercial, and OPA classes?

A. The statistical analysis of residential, commercial, and OPA usage shows that once weather effects and the one-time effects of COVID-19 have been accounted for, there is a significant downward trend for residential customers and fairly stable usage for commercial and OPA customers over time. Charts 5 through 10 below show use per customer for residential, commercial, and OPA customers respectively for the ten years

⁵ DeOreo, William and Mayer, Peter. American Water Works Association Journal. Vol. 104. Issue 6. http://apps.awwa.org/WaterLibrary/showabstract.aspx?an=JAW_0076117. June 2012

ending March 2022, adjusted for the weather impacts and COVID-19 impacts I previously



described in my testimony.



2









1 Q. What conclusions do these charts reveal?

A. Extending the historical trends in adjusted usage going forward, these charts and the
supporting analysis demonstrate that there has been a significant and pervasive decline in

1		normalized use per customer for residential customers both in St. Louis County and non-
2		St. Louis County service territories. There has not been a significant movement over time
3		in normalized use per customer in either the St. Louis County or non-St. Louis County
4		service territories for commercial or OPA customers.
5		VI. REVENUE CALCULATIONS
6	Q.	Please explain the development of MAWC's pro-forma revenues as set forth in the
7		revenue related Schedules (CAS-8, CAS-11 and CAS-12).
8	A.	The process of developing the Company's revenue requirement begins with revenues
9		recorded on the Company's books of account on June 30, 2022, to which various
10		adjustments were made. A summary of the development of pro forma revenues for
11		MAWC's water and sewer operations under present and proposed rates are set forth on
12		Schedules CAS-11 and CAS-12, which show operating revenues by customer
13		classification for the twelve months ending June 30, 2022 (normalized), twelve months
14		ended December 31, 2022, and twelve months ended May 31, 2023 under present rates and
15		proposed rates. CAS-11 shows a summary by revenue class, and CAS-12 shows the detail
16		by revenue class. In addition to pro forma revenues at current rates, Schedules CAS-11
17		and 12 show pro forma revenues at proposed rates. These rates are based on the rate design
18		discussion previously outlined in my Direct Testimony.
19	Q.	Please explain the adjustments to the Company's book revenues that were made to
20		develop pro forma revenues under present rates as shown on Schedule CAS-8.
21	A.	Schedule CAS-8 begins with test year revenues for the 12 months ended June 30, 2022. At

the time of filing, the test year is based on 9 months of actual revenues through March 31,

23 2022, and 3 months of estimates through June 30, 2022. Three adjustments are made to

present a pro forma revenue for the 12 months ended June 30,2022. First, unbilled revenue
 is eliminated. Second, all revenue related to Water & Sewer Infrastructure Replacement
 Surcharge ("WSIRA") is eliminated. Lastly, the per books revenues were adjusted for the
 bill analysis normalization as shown in Schedules CAS-11 and 12.

5 Q. Please explain the adjustments to determine the Company's pro forma revenues as 6 shown on Schedules CAS-8 and CAS-11 and 12.

7 A. The revenue adjustments are primarily for customer growth and for customer usage. We 8 project customer counts and use per customer for residential, commercial, industrial, OPA, 9 sales for resale, and fire service classes for St. Louis County and non-St. Louis County 10 service territories for water service. These include projections specifically for Rate J 11 customers and any special contracts. These projections also include any customers and sales associated with acquisitions. We also project customer counts and usage data for 12 13 wastewater customers that include both existing customers and acquisitions. The Company 14 also projects miscellaneous revenues for both water and wastewater service to complete 15 the calculation of revenues for the relevant periods.

Q. Please describe the methods used for estimating customer counts, use per customer, and billing determinants for residential water sales.

A. Customer growth for residential customers was projected using a 5-year historical growth
 pattern from 2017 through 2021 applied to customer counts as of March 31, 2022.
 Residential use per customer was developed based on the normalized values from the usage
 modeling previously discussed in my Direct Testimony.

Q. Please describe the methods used for estimating customer counts, use per customer, and billing determinants for Commercial, Industrial, OPA and Other Water Utilities

1

(OWU) water sales.

2 Commercial and OPA customer counts are based on organic growth using the 5-year A. 3 historical growth pattern for these classes from 2017 through 2021. No customer growth 4 was projected for the Industrial class and the Sales for Resale class. Usage for all these 5 non-residential classes is projected using a 5-year annual average usage per customer 6 multiplied by the projected number of customers. Because there is not a significant trend 7 in use per customer for these classes as I have previously discussed in my testimony, the 8 Company is using a 5-year average of water usage (2017-2021) for these customer classes, 9 which is an appropriate period to use for normalizing sales when there is no strong 10 underlying trend in usage. This time period eliminates short-term fluctuations in usage 11 while still reflecting normal water consumption levels for these customers.

12

Q. Please describe how projections were made for Rate J customers and sales.

A. Non-residential customers excluding Sale for Resale customers constantly using large
 quantities of water not less than 450,000 gallons per month are classified as Rate J
 customers. Usage for Rate J customers was projected using a 5-year average annual usage
 per customer for the time period 2017-2021.

Q. Did you also compute the total estimated gallons of production that correspond to your revenue forecast and that were used by Company witness Michael Schwarzell for purposes of the system delivery adjustments that he proposes for water service?

A. Yes, I did. System deliveries are calculated separately for St. Louis County and non-St. Louis County operations and are based on the five-year average from 2017 through 2021 of non- revenue water percentages, which is the percentage of total system deliveries in a year that is not attributable to metered sales. This average non-revenue water percentage is

1		applied to total sales for the 12- month period ending May 2023 to arrive at system
2		deliveries for the same period.
3	Q.	Please describe the methods used for estimating revenue for private fire service.
4	А.	Revenue for private fire was calculated using nine months of actual historical counts of
5		service connections and hydrants in service through March 31, 2022, and three months of
б		estimated counts through June 30, 2022. Organic growth was projected using the 5-year
7		average change in counts for the years 2017-2021.
8	Q.	Please describe how customer count and sales information was developed for
9		wastewater customers.
10	А.	Organic growth for residential and commercial classes were calculated using the 5-year
11		average growth patterns from 2017-2021. No customer growth was projected for the OPA
12		class. Water usage/flow for the City of Arnold was projected using a 5-year average water
13		usage/flow per customer.
14	Q.	How was this information developed for the acquisitions the Company is including in
15		this case for wastewater service.
16	А.	The billing determinants for the City of Taos and the City of Hallsville used the actual
17		billing determinants through March 2022 and then annualized for a full 12-month billing
18		period. The billing determinants for the City of Eureka were taken from the billing register
19		provided to the Company for the twelve months ended March 2022. The billing
20		determinants for Monsees Lake, City of Purcell, City of Stewartsville, and the City of
21		Smithton are all estimated based on estimates from the acquisition information.
22	Q.	Please describe how miscellaneous revenues were developed.

in agreements from the Test Year period. Revenues for late payment fees are based on a 3 year average ratio of actual late payment fees charged to customers to actual billed
 revenues. Revenue projection for Returned Check Charges, Reconnect Fees, After Hours
 Charges, Application Fees, Frozen Meter and Miscellaneous Services revenues are based
 on 5-year average historical revenues from 2017 through 2021.

6

VII. REVENUE STABILIZATION MECHANISM

7 Q. What is a Revenue Stabilization Mechanism?

A. A Revenue Stabilization Mechanism ("RSM") is an accounting and ratemaking tool that is
designed to align the Company's revenues going forward (i.e., beyond the conclusion of
this proceeding) with the level of authorized revenue ultimately approved by the
Commission. This mechanism stabilizes changes in revenues resulting from changes in
volumes of water sold to customers on an ongoing basis due to factors largely beyond the
control of the Company.

14 **Q.** Ho

How does an RSM work?

15 A. The mechanics of the Company's proposed RSM are discussed in greater detail in the Direct Testimony of Company witness John Watkins. Generally speaking though, the 16 Company's proposed RSM will adjust rates up or down over time so that the revenue the 17 18 Company collects is consistent with the revenue requirement approved by the Commission 19 for water service in this proceeding. The RSM affords the Company with the ability to 20 collect an annual revenue amount consistent with the authorized revenue amount in this 21 case and that customers in total pay the revenue level found appropriate to produce just and 22 reasonable rates.

23 Q. Which customer classes are included in the RSM?

1	A.	As described in Section 386.266.4, RSMo, the RSM would be applicable to water
2		customers in the residential, commercial, OPA, and sale for resale classes.
3	Q.	Which customer classes would be excluded from the RSM?
4	A.	Industrial water customers and water customers taking service under contract rates. All
5		wastewater customers would also be excluded.
6	Q.	Do the revenues the Company collects under the WSIRA factor into the RSM?
7	A.	No. The RSM only compares the water revenues for eligible customer classes authorized
8		to be collected through base rates in the Company's rate case to the actual base rate water
9		revenue collected from those customers in the eligible customer classes. The WSIRA
10		mechanism already includes a reconciliation that essentially functions as an RSM.
11		Revenues authorized and collected via WSIRA are not part of the RSM.
12	Q.	How will the RSM that the Company is proposing generally function?
13	A.	As explained in greater detail in the Direct Testimony of Company witness Mr. Watkins,
14		the RSM will compare water revenues for eligible customers authorized in a rate case to

15 actual base water revenues collected from eligible customers, net of applicable production

16 costs, and net of acquisitions that have not yet been through a general rate case.

17 Q. Why is the Company proposing that new acquisitions be excluded from the RSM?

A. As described in Section 386.266.5(1), RSMo, the Commission may approve RSM rate schedules provided it finds the adjustment mechanism "is reasonably designed to provide the utility with a sufficient opportunity to earn a fair return on equity." When the Company acquires new systems, there are many costs incurred that are offset, sometimes only partially, by the revenues collected from those customers. If the revenues from acquisitions are included in the adjustment mechanism, the Company will incur these costs with no revenues to offset them. These incremental costs will reduce the Company's opportunity
 to earn a fair return on Equity.

3 Q. Why is the Company proposing that the incremental production costs be included in 4 the RSM?

5 Similarly to the discussion about acquisitions in the RSM above, excluding the incremental A. 6 production costs would reduce the Company's opportunity to earn a fair return on equity. 7 In the instance where the Company's eligible revenues are more than what was authorized, 8 this amount would be returned to the customers. However, that additional revenue will be 9 generated by increased water sales, and treating and pumping that additional water creates 10 incremental additional production costs. If the additional revenues went to the RSM, the 11 Company would be left with additional costs and no revenues to offset them. In the 12 opposite example, where the Company's eligible revenues are less than what was 13 authorized, this amount would be collected from customers via a surcharge. The shortfall 14 of revenue will be generated by decreased water sales, and the Company will likewise 15 experience lower production costs as a result. It would not be fair to customers to collect 16 the revenue shortfall from them, while not also including the benefit of the reduced 17 expense.

Q. Of the total revenues collected under your proposed water rates, how much revenue
 is being collected through fixed charges and how much revenue is being collected
 through volumetric charges?

A. Total proposed water revenues equals \$468,757,639. Of this amount, \$90,955,000 is
 collected through fixed charges (19.4% of the total) \$372,556,606 is collected through
 volumetric charges (79.5% of the total), and \$5,246,033 is collected through miscellaneous

1 fees (1.1% of the total).

2

Q. Is ongoing revenue volatility a significant concern?

3 Α. Yes. Approximately 79.5% of the Company's water service revenues will be collected as 4 volumetric rates pursuant to the Company's proposed rate structure in this case, which 5 means that revenues will vary up or down depending on how much water our customers 6 use. At the same time, over 90% of the Company's costs are fixed costs, which do not vary 7 depending on how much water our customers use. If water sales are less than the levels 8 used to set the Company's water service rates in this proceeding, the Company's revenues 9 will be less than the authorized level in this proceeding, and as a result, the Company's 10 ability to recover the costs that the Commission determines to be prudent will be 11 diminished. Likewise, if revenues exceed the authorized level in this proceeding due to 12 higher than anticipated water sales, the Company will recover more than the authorized 13 level in this proceeding. The RSM will permit the Company to recover the level of revenue 14 authorized in this case, as the difference between that amount and actual revenues will be 15 charged or credited back to customers in the subsequent year.

16 **Q.**

What are the external factors that cause revenues to be volatile from year to year?

A. There are two primary factors that cause revenue volatility from year to year -- seasonal
 weather conditions and the ongoing trend of declining use for residential, commercial, and
 municipal customers.

20 Seasonal weather conditions can cause water sales to either increase or decrease 21 from expected going-forward levels, which, in turn, cause revenues to increase or decrease 22 from expected going levels. Hot dry summers tend to increase water sales, and cooler 1

2

wetter summers tend to decrease water sales. Weather volatility in either direction causes volatility in revenues.

3 Continuing trends in declining use per customer in the residential, commercial, and 4 OPA classes also cause volatility in revenues. I have previously testified to both the impact 5 of weather conditions on annual water sales and on the continuing trends in declining use 6 and the associated impact of declining use on water sales. It is expected that water 7 consumption per customer will continue to decline over the next several years. Both of 8 these conditions cause declines in revenues, and it is expected that both total consumption 9 on a per customer basis, and revenue on a per customer basis will continue to decline well beyond the period of time for which a revenue requirement is approved and rates are set in 10 11 this case. 12 Does the Company have any control over either seasonal weather conditions or the **Q**. 13 drivers that are causing declining usage? 14 Α. No, it does not.

Q. Are there other factors that can cause the Company's revenue to deviate from
 expected levels?

A. Yes. The COVID-19 pandemic situation is a prime example of an external event that can
cause the Company's revenues to vary from expected or approved levels. Since March of
2020, the Company has seen increased sales volumes for residential customers beyond
expected levels due to the COVID-19 pandemic, as more people were staying home from
work and school. Over the same period, the Company saw decreases in sales volumes from
expected levels in the commercial and OPA classes. These changes in volumes, whether
temporary or permanent, cause changes in revenues from expected or authorized levels and

increase the Company's revenue volatility. Implementation of a well-structured RSM can
 stabilize customer bills over time and mitigate the Company's revenue volatility due to
 circumstances beyond the customer or Company's control.

Does the Company have the ability to reduce its costs when water sales are lower than

4 5 0.

expected to compensate for the reductions in revenues?

6 A. To some extent, the Company experiences a reduction in variable costs associated with the 7 reduced cost of treating and pumping less water. For the most part, however, the 8 Company's ability to reduce its fixed costs during periods when water sales are lower is 9 limited, and it is generally not in the long-term best interests of our customers for the 10 Company to do so. One simple example of this is employee counts. The Company can 11 hardly hire and fire its well-trained workforce based on short-term trends in weather or 12 economic conditions simply to keep expenses in line with revenues. Similarly, although 13 maintenance may be deferred in a period of reduced revenue, that merely forestalls the 14 inevitable, could degrade the quality of service provided to MAWC's customers, and 15 increase the cost of service over time.

Q. Beyond changes in variable cost, does the continuing trend in declining use per
 customer reduce the revenue requirement needed to invest in, maintain, and operate
 the water system for the long-term benefit of the Company's customers?

19 A. No, it does not.

Q. Isn't the possibility of reduced revenues for the Company a good thing for customers
because it means customers' water bills are lower than they otherwise would have
been?

- A. In the short term, that may appear to be the case. Ultimately, however, a decreasing
 revenue stream is not in the long-term best interest of our customers if revenue
 requirements are not reduced to match the decreasing revenue stream.
- 4

5

Q. How is a volatile and decreasing long-term revenue stream not in the long-term best interests of the Company's water service customers?

- A. The Company is committed to helping customers use water efficiently and to provide
 quality water service that is affordable. As I explain below, the Company's ability to
 reliably recover its revenue requirement over the long term through rates is an important
- 9 part of the Company's ability to properly operate, maintain, and invest in the water system
- 10 at a reasonable cost. This ability to prudently manage the systems at a reasonable cost is in
- 11 the long-term best interests of our customers.

12 Q. Does Missouri law allow the Commission to approve the Company's proposed RSM?

- 13 A. Yes. It is my understanding that Section 386.266.4, RSMo, provides as follows:
- 14 Subject to the requirements of this section, a water corporation with more 15 than eight thousand Missouri retail customers may make an application to the commission to approve rate schedules authorizing periodic rate 16 17 adjustments outside of general rate proceedings to ensure revenues billed by such water corporation for regulated services equal the revenue 18 requirement for regulated services as established in the water corporation's 19 20 most recent general rate proceeding or complaint proceeding, excluding any 21 other commission-approved surcharges and gross receipts tax, sales tax, and 22 other similar pass-through taxes not included in tariffed rates, due to any 23 revenue variation resulting from increases or decreases in residential, 24 commercial, public authority, and sale for resale usage. 25
- 26 (emphasis added).

Q. What did the General Assembly identify when authorizing the Commission to approve the adoption of alternative recovery mechanisms such as the RSM?

A. I believe that purpose is found within the statute itself. Section 386.266.4, RSMo states
that "... to ensure revenues billed by such water corporation for regulated services equal
the revenue requirement for regulated services as established in the water corporation's
most recent general rate proceeding or complaint proceeding... due to any revenue
variation resulting from increases or decreases in residential, commercial, public
authority, and sale for resale usage." (emphasis added).

Q. Is the approach to water corporations different for the mechanism applicable to
electric and gas corporations in Missouri?

9 A. Yes. Electric and gas corporations are limited to "variations in either weather,
10 conservation, or both." Section 386.266.4. The General Assembly appears to have
11 recognized that there are issues that cause fluctuations in usage that are unique to water
12 corporations.

Q. How does a properly structured RSM address this purpose and benefit MAWC's customers?

15 It is in the long-term best interests of customers for the Company to be able to reliably A. 16 recover its revenue requirement on an ongoing basis. The authorized water revenue 17 requirements approved by the Commission in this case represent the amount of revenue 18 the Commission determines that the Company needs to operate, maintain, and invest in its 19 water system in a prudent and efficient manner. The ability to reliably recover the 20 Company's approved revenue requirement improves the Company's ability to plan, 21 manage, maintain, and invest in the facilities necessary to continue providing safe, reliable, 22 and high-quality water service at a reasonable cost to customers, and a properly structured 23 RSM does just that.

1

Q. Are there other benefits to customers from the approval of an RSM?

2 Yes. An RSM will eliminate the throughput incentive – the Company's financial incentive A. 3 to sell more water. Under the current rate structure (without an RSM), the more water 4 customers use, the more water the Company sells, the more revenue the Company collects, 5 and the better the Company's financial performance. Currently, from a public policy 6 perspective, any actions taken by the Company or the government (local, state, or Federal) 7 to encourage conservation, no matter how beneficial to society, creates a disconnect 8 between the public policy goal of more efficient use of water resources and the Company's 9 legitimate financial objectives.

10 The Company is engaged in a broad array of efforts to become more efficient, and 11 an RSM supports more consistent planning and deployment of the most efficient resources. 12 Improving water efficiency also reduces withdrawals from limited freshwater supplies, 13 leaving more water for future use and improving the ambient water quality and aquatic 14 habitat. Improving water efficiency is a "win/win/win" providing a wide range of benefits 15 for consumers, utilities, businesses, and for communities as a whole. Approving an RSM 16 opens the path to achieving that winning combination.

17 Q. Are there other policy concerns among public utility regulators that an RSM 18 addresses?

A. Yes. The National Association of Regulatory Utility Commissioners ("NARUC") has been
 at the forefront of this issue. At its November 2013 annual meeting, NARUC adopted a
 resolution that supports the consideration of alternative recovery mechanisms for water and
 wastewater utilities, attached hereto as Schedule CBR-7. The NARUC resolution
 recognizes declining use per customer, a shift to non-revenue producing infrastructure

1 replacement, and that the traditional cost of service model is not well adapted to this new 2 environment. It states, in part: 3 WHEREAS, Traditional cost of service ratemaking, which has worked 4 reasonably well in the past for water and wastewater utilities, no longer 5 adequately addresses the challenges of today and tomorrow. Revenue, 6 driven by declining use per customer, is flat to decreasing, while the nature of investment (rate base) has shifted largely from plant needed for serving 7 8 new customers to non-revenue producing infrastructure replacement and 9 compliance with new drinking water standards; and 10 WHEREAS, The traditional cost of service model is not well adapted to a no/low growth, high investment utility environment and is unlikely to 11 12 encourage the necessary future investment in infrastructure replacement; 13 and 14 WHEREAS, Compared to the water and wastewater industry, the electric 15 and natural gas delivery industries have in place a larger number and a 16 greater variety of alternative regulation policies, such as multiyear rate 17 plans and rate stabilization programs, and those set forth in the 2005 Resolution: and 18 19 WHEREAS, The U.S. water industry is the most capital intensive sector of 20 regulated utilities and faces critical investment needs that are expected to 21 total \$335 billion to \$1 trillion over the next quarter century, as noted in the American Society of Civil Engineers 2013 Report Card for America's 22 23 Infrastructure... The NARUC resolution goes on to recommend the adoption of alternative recovery 24 25 mechanisms such as the RSM. It states that: 26 Alternative regulatory mechanisms can enhance the efficiency and 27 effectiveness of water and wastewater utility regulation by reducing 28 regulatory costs, increasing rates for customers, when necessary, on a more gradual basis; and providing the predictability and regulatory certainty that 29 30 supports the attraction of debt and equity capital at reasonable costs and maintains that access at all times. 31 32 **O**. Are alternative regulatory mechanisms such as the RSM recognized in the regulatory 33 community as an effective means of addressing these policy concerns? 34 Yes. RSMs have been adopted in many states to eliminate the throughput incentive, A. 35 support energy efficiency initiatives and investment, and align actual revenue collection

1 with authorized revenue. Clauses similar to the RSM proposed here have been successfully 2 used for some time for water utilities in New York and California and have been more recently adopted for water utilities in Connecticut, Nevada, Maine, and Illinois. 3 In 4 addition, similar revenue stabilizing mechanisms have been approved for gas utilities in 23 5 states and an additional two states plus the District of Columbia have mechanisms pending. 6 according to the December 2016 report from the American Gas Association entitled 7 "Innovative Rates, Non-Volumetric Rates, and Tracking Mechanisms: Current List."⁶ This 8 report also states that Weather Normalization Adjustments are allowed in 22 states. A 9 December 2017 report by the Institute for Electric Innovation lists 32 states and the District 10 of Columbia that have an approved fixed cost recovery mechanism for electric utilities with 11 an additional state pending approval.

12 Q. Please summarize why adoption of an RSM for the Company and its customers is
13 appropriate in this proceeding.

A. Adoption of an RSM is in the long-term best interest of the Company and its customers.
Rate designs that tie a utility's revenue recovery directly to sales volume have prompted
two widespread concerns in modern utility regulation. First, rewarding a water utility for
selling more water implicitly encourages water use and penalizes a water utility for
encouraging end use water efficiency and conservation. This misalignment is unfortunate
because utilities can play an important role in helping to improve water efficiency and
promote conservation. Second, because of seasonal variability and declining use per

21

customer, volumetric rates do not give water utilities a reasonable opportunity to recover

⁶ An earlier 2013 study by the Brattle Group entitled "Alternative Regulation and Ratemaking Approaches for Water Companies: Supporting the Capital Investment Needs of the 21st Century," prepared for the National Association of Water Companies, (September 30, 2013) found that 27 states for electricity, 30 states for natural gas delivery, and 5 states for water have this kind of mechanism.

1		their authorized revenues. By allowing the Company to collect the revenues authorized
2		by the Commission, the RSM: 1) makes the Company indifferent to selling less water;
3		2) promotes water efficiency and conservation; 3) reduces the adverse impact of weather
4		variability for both the utility and its customers; and 4) reasonably provides that revenues
5		for continued water efficiency investments are available. In addition, the revenue
6		volatility that has been caused by the COVID-19 pandemic and that may continue as our
7		customers continue to recover from the economic effects of the pandemic provides
8		another strong argument for adoption of the RSM and makes the present case a
9		particularly appropriate time to implement such a mechanism. The result is a better
10		alignment of all stakeholder interests, and the Company respectfully requests the
11		Commission to authorize its proposed RSM.
12	Q.	Does this conclude your Direct Testimony?
13	A.	Yes.

Missouri-American Water Company

Case No.

Proposed Water Rate Design

	Present	Present	Proposed	Proposed
	Rate	Rate	Rate	Rate
	St Louis	All	St Louis	All
Meter Charge	County	 Other	 County	 Other
5/8 - Meter	\$ 9.00	\$ 9.00	\$ 12.00	\$ 12.00
3/4 - Meter	\$ 12.25	\$ 12.25	\$ 16.00	\$ 16.00
1 - Meter	\$ 16.58	\$ 16.58	\$ 25.00	\$ 25.00
1 1/2 - Meter	\$ 27.42	\$ 27.42	\$ 45.00	\$ 45.00
2 - Meter	\$ 40.43	\$ 40.43	\$ 65.00	\$ 65.00
3 - Meter	\$ 71.10	\$ 71.10	\$ 115.00	\$ 115.00
4 - Meter	\$ 114.11	\$ 114.11	\$ 180.00	\$ 180.00
6 - Meter	\$ 222.47	\$ 222.47	\$ 350.00	\$ 350.00
8 - Meter	\$ 379.54	\$ 379.54	\$ 560.00	\$ 560.00
10 - Meter	\$ 637.71	\$ 637.71	\$ 850.00	\$ 850.00
12 - Meter	\$ 765.25	\$ 765.25	\$ 1,375.00	\$ 1,375.00
Flat Rate - RT 1.2		\$ 48.40		\$ 55.00
Flat Rate - Table Rock		\$ 20.58		\$ 55.00
Flat Rate - Montsees Lake		\$ 35.30		\$ 55.00
Rate A Volumetric	\$ 0.56290	\$ 0.62469	\$ 0.85672	\$ 0.85672
Rate J Volumetric	\$ 0.17797	\$ 0.28268	\$ 0.29638	\$ 0.37672
Rate B Volumetric	\$ 0.26194	\$ 0.26194	\$ 0.32639	\$ 0.32639
Eureka	\$ 0.56290		\$ 0.85672	
Triumph		\$ 0.06284		\$ 0.09615
Empire		\$ 0.25145		\$ 0.33268
Mexico - 1st 3000 g		\$ 0.57266		\$ 0.85672
Mexico - Next 7000 g		\$ 0.71583		\$ 0.85672
Mexico - Over 10000 g		\$ 0.79027		\$ 0.85672
C-1 Foxed Revenue	\$ 118,510			
City of Kirkwood	\$ 0.10404		\$ 0.10757	
PWSD #C-1 Jefferson	\$ 0.09984		\$ 0.10282	
Charlton Co Dist #2		\$ 0.62740		\$ 0.64653
	Present	Present	Proposed	Proposed
	Rate	Rate	Rate	Rate
	St Louis	All	St Louis	All
Private Fire	County	Other	County	Other
2 or less - Meter	\$ 6.00	\$ 6.00	\$ 8.70	\$ 8.70
3 - Meter	\$ 19.36	\$ 19.36	\$ 26.00	\$ 26.00
4 - Meter	\$ 23.85	\$ 23.85	\$ 34.60	\$ 34.60
6 - Meter	\$ 53.70	\$ 53.70	\$ 77.90	\$ 77.90
8 - Meter	\$ 95.55	\$ 95.55	\$ 138.50	\$ 138.50
10 - Meter	\$ 149.25	\$ 149.25	\$ 216.00	\$ 216.00
12 - Meter	\$ 214.94	\$ 214.94	\$ 311.20	\$ 311.20
20 - Meter	\$ 356.83	\$ 356.83	\$ 517.40	\$ 517.40
Hydrant	\$ 53.70	\$ 53.70	\$ 77.90	\$ 77.90

Missouri-American Water Company Case No.

Proposed Wastewater Rate Design

Arnold	Present	Proposed
Minimum Charge	\$ 37.23	\$ 37.50
Usage - 1st 5000 g	\$ -	\$ -
Usage - Over 5000 g	\$ 0.7140	\$ 0.7188

		Present	Present	Pres		Present	Present		Proposed				Proposed		Proposed
Other Tariffs		Rate Tarrif 2.1	Rate Tariff 3.1	R Tariff	ate 3.2	Rate Tariff 4.1	Rate Eureka		Rate Tarrif 2.1		Tariff 3.1	Tariff 3.2	Rate Tariff 4.1		Rate Eureka
Minimum Charge	\$	61.64	\$ 44.03	\$ 65.	00		\$ 44.03	\$	66.70	\$	49.65	\$ 66.70		\$	49.65
5/8 - Meter	\$	61.64	\$ 44.03				\$ 44.03	\$	66.70	\$	49.65			\$	49.65
3/4 - Meter	\$	80.19	\$ 57.28				\$ 57.28	\$	86.80	\$	64.60			\$	64.60
1 - Meter	\$	117.20	\$ 83.71				\$ 83.71	\$	126.80	\$	94.40			\$	94.40
1 1/2 - Meter	\$	209.79	\$ 149.85				\$ 149.85	\$	227.00	\$	169.00			\$	169.00
2 - Meter	\$	320.90	\$ 229.22				\$ 229.22	\$	347.20	\$	258.50			\$	258.50
3 - Meter	\$	565.37	\$ 403.84				\$ 403.84	\$	611.80	\$	455.40			\$	455.40
4 - Meter	\$	926.33	\$ 661.66				\$ 661.66	\$	1,002.40	\$	746.05			\$	746.05
Usage - 1st 6000 g	\$	-	\$ -				\$ -	Ś	-	Ś	_			Ś	
Usage - Over 6000 g	\$	1.0274	0.7338				\$ 0.7338	\$	1.0540		0.8303			\$	0.8303
Minimum Charge - Reside					\$	38.75						Ş	49.65		
Minimum Charge - Non R	esidentia				\$	48.75						Ş	49.65		
Monsees Lake	\$	58.00						\$	66.70						

Missouri-American Water Company 2022 General Rate Case

Water Affordability Summary - Bills for Basic Water Service (40 gallons per household member per day)

Income	Household	Water			Bill Under Proposed	BTI					~	ustomers by FPL					
Level	Household Size	Service	Income	Customers	Rates	Ratio	0-50%	50%-100%	100%-150%	150%-200%	C 200%-250%	250%-300%	300%-350%	350%-400%	400%-450%	450%-500%	Over 500%
\$0-\$5k	1	1,200 \$		4,942 \$	22.28	8.9%	4,942		-		-		-	-	-	-	
\$0-\$5k	2	2,400 \$		1,962 \$	32.56	13.0%	1,962	-	-	-	-	-	-	-	-	-	-
\$0-\$5k	3	3,600 \$		870 \$	42.84	17.1%	870	-	-	-	-	-	-	-	-	-	-
\$0-\$5k	4	4,800 \$	-,	394 \$	53.12	21.2%	394	-	-	-	-	-	-	-	-	-	-
\$0-\$5k \$0-\$5k	6	6,000 \$ 7,200 \$		170 \$ 92 \$	63.40 73.68	25.4% 29.5%	170 92										
\$0-\$5k	7	8,400 \$		34 \$	83.96	33.6%	34	-							-		-
\$5-\$10k	1	1,200 \$		4,987 \$	22.28	3.6%	1,242	3,745	-				-			-	-
\$5-\$10k	2	2,400 \$		1,898 \$	32.56	5.2%	1,311	586	-	-	-	-	-	-	-	-	-
\$5-\$10k	3	3,600 \$.,	743 \$	42.84	6.9%	743	-	-	-	-	-	-	-	-	-	-
\$5-\$10k	4	4,800 \$	1,500	370 \$	53.12	8.5%	370	-	-	-		-	-		-	-	-
\$5-\$10k	5	6,000 \$		150 \$	63.40	10.1%	150	-	-	-	-	-	-	-	-	-	-
\$5-\$10k \$5-\$10k	6 7	7,200 \$		83 \$ 28 \$	73.68 83.96	11.8% 13.4%	83 28	-	-	-	-	-	-	-	-	-	-
\$10-\$15k	1	1,200 \$		28 \$ 8,668 \$	22.28	2.1%	28	4,317	- 4,351	-	-		-	-		-	
\$10-\$15k	2	2,400 \$		1,922 \$	32.56	3.1%		1,922	4,551								
\$10-\$15k	3	3,600 \$		671 \$	42.84	4.1%	89	582	-				-			-	-
\$10-\$15k	4	4,800 \$	12,500	408 \$	53.12	5.1%	234	173	-	-	-	-	-	-	-	-	-
\$10-\$15k	5	6,000 \$	12,500	142 \$	63.40	6.1%	142	-	-	-	-	-	-	-	-	-	-
\$10-\$15k	6	7,200 \$	12,500	109 \$	73.68	7.1%	109	-	-	-	-	-	-	-	-	-	-
\$10-\$15k	7	8,400 \$		58 \$	83.96	8.1%	58	-	-	-	-	-	-	-	-	-	-
\$15-\$20k	1	1,200 \$		10,173 \$	22.28	1.5%	-		7,599	2,574	-	-	-	-	-	-	-
\$15-\$20k	2	2,400 \$		3,281 \$	32.56	2.2%	-	1,253	2,028		-	-	-	-	-	-	
\$15-\$20k	3	3,600 \$ 4,800 \$		1,242 \$ 739 \$	42.84	2.9%		1,242 739	-		-	-	-	-	-	-	
\$15-\$20k \$15-\$20k	4	4,800 \$		739 \$ 320 \$	53.12 63.40	3.6% 4.3%	- 5	739	-		-	-	-	-	-	-	
\$15-\$20k	6	7,200 \$,	114 \$	73.68	5.1%	52	62									
\$15-\$20k	7	8,400 \$		62 \$	83.96	5.8%	56	6	-				-			-	-
\$20-\$25k	1	1,200 \$		8,202 \$	22.28	1.2%	-		-	8,169	33	-	-	-	-	-	-
\$20-\$25k	2	2,400 \$	22,500	4,189 \$	32.56	1.7%		-	4,189		-	-	-	-	-	-	-
\$20-\$25k	3	3,600 \$		1,469 \$	42.84	2.3%	-	391	1,078	-	-	-	-	-	-	-	-
\$20-\$25k	4	4,800 \$		765 \$	53.12	2.8%	-	765	-	-	-	-	-	-	-	-	-
\$20-\$25k	5	6,000 \$		438 \$	63.40	3.4%	-	438	-	-	-	-	-	-	-	-	-
\$20-\$25k	6	7,200 \$		190 \$	73.68	3.9%	-	190	-	-	-	-	-	-	-	-	-
\$20-\$25k \$25-\$35k	7	8,400 \$ 1.200 \$		57 \$ 15.672 \$	83.96 22.28	4.5% 0.9%	-	57	-		- 9.756	-	-	-	-	-	-
\$25-\$35k \$25-\$35k	2	2,400 \$		11,586 \$	32.56	1.3%			423	- 9,796	1,367	5,916	-	-		-	
\$25-\$35k	3	3,600 \$		3,729 \$	42.84	1.7%			2,608	1,120	1,507						
\$25-\$35k	4	4.800 \$		2,890 \$	53.12	2.1%	-	217	2,673	-			-			-	
\$25-\$35k	5	6,000 \$		1,357 \$	63.40	2.5%	-	702	656	-	-	-	-	-	-	-	-
\$25-\$35k	6	7,200 \$		559 \$	73.68	2.9%	-	536	23	-	-	-	-	-	-	-	-
\$25-\$35k	7	8,400 \$	30,000	259 \$	83.96	3.4%	-	259	-	-	-	-	-	-	-	-	-
\$35-\$50k	1	1,200 \$		19,018 \$	22.28	0.6%	-	-	-	-	-	3,132	7,918	7,918	51	-	-
\$35-\$50k	2	2,400 \$		18,516 \$	32.56	0.9%	-	-	-	-	8,980	9,536	-	-	-	-	-
\$35-\$50k	3	3,600 \$		6,217 \$	42.84	1.2%	-	-	-	3,175	3,042	-	-	-	-	-	-
\$35-\$50k	4	4,800 \$		3,960 \$	53.12	1.5%	-	-	957	3,003	-	-	-	-	-	-	-
\$35-\$50k \$35-\$50k	5	6,000 \$ 7,200 \$		2,515 \$ 1,135 \$	63.40 73.68	1.8% 2.1%	-	-	1,719 1,135	796	-	-	-	-	-	-	-
\$35-\$50k	7	8,400 \$		406 \$	83.96	2.1%		109	297								
\$50-\$75k	, 1	1,200 \$		21,189 \$	22.28	0.4%	-	-	- 257				-		5,259	5,293	10,637
\$50-\$75k	2	2,400 \$		29,587 \$	32.56	0.6%	-		-	-	-	864	10,006	10,006	8,710	-	
\$50-\$75k	3	3,600 \$	62,500	11,357 \$	42.84	0.8%	-		-	-	1,510	4,845	4,845	157		-	-
\$50-\$75k	4	4,800 \$		8,800 \$	53.12	1.0%	-		-	528	4,532	3,740	-	-	-	-	-
\$50-\$75k	5	6,000 \$		4,038 \$	63.40	1.2%	-	-	-	1,670	2,368	-	-	-	-	-	
\$50-\$75k	6	7,200 \$		1,697 \$	73.68	1.4%			128	1,174	395	-	-	-	-	-	-
\$50-\$75k	7	8,400 \$		1,020 \$	83.96	1.6%	-		348	673	-	-	-	-	-	-	
\$75-\$100k	1	1,200 \$		10,951 \$	22.28	0.3%	-		-		-	-	-		-		10,951
\$75-\$100k \$75-\$100k	2	2,400 \$ 3,600 \$		23,499 \$ 10,191 \$	32.56 42.84	0.4%			-		-	-	-	- 4,207	1,029 4,348	7,947 1,637	14,522
\$75-\$100k \$75-\$100k	4	4,800 \$		8,262 \$	42.84	0.6%						- 744	- 4,255	4,207 3,264	4,540	1,057	-
\$75-\$100k	4 5	6.000 \$		3.627 \$	63.40	0.9%		-	-	-	- 62	2.188	4,233	-	-	-	
\$75-\$100k	6	7,200 \$		1,460 \$	73.68	1.0%		-	-	-	670	790	-,,	-	-	-	
\$75-\$100k	7	8,400 \$		856 \$	83.96	1.2%		-	-	103	668	85	-	-	-	-	
\$100-\$150k	1	1,200 \$		7,273 \$	22.28	0.2%		-	-	-	-		-	-		-	7,273
\$100-\$150k	2	2,400 \$		29,933 \$	32.56	0.3%	-	-	-	-	-	-	-	-	-	-	29,933
\$100-\$150k	3	3,600 \$		14,472 \$	42.84	0.4%	-	-	-	-	-	-	-	-	-	1,925	12,547
\$100-\$150k	4	4,800 \$		12,888 \$	53.12	0.5%		-	-	-	-	-	-	773	3,319	3,319	5,477
\$100-\$150k	5	6,000 \$		5,905 \$	63.40	0.6%		-	-	-	-	-	661	1,781	1,781	1,681	
\$100-\$150k	6	7,200 \$ 8.400 \$		2,206 \$ 1.217 \$	73.68	0.7%		-	-	-	-	166	763	763	513	-	
\$100-\$150k Over \$150k	, 1	8,400 \$ 1,200 \$.,	1,217 \$ 4,800 \$	83.96 22.28	0.8%	-	-	-	-	-	415	475	328	-	-	4.800
Over \$150k Over \$150k	1	1,200 \$ 2,400 \$		4,800 \$ 27,523 \$	32.56	0.1%											4,800 27,523
Over \$150k	3	3,600 \$,	15.661 \$	42.84	0.3%		-	-	-	-	-	-	-	-	-	15.661
Over \$150k	4	4,800 \$		16,938 \$	53.12	0.3%			-							-	16,938
Over \$150k	5	6,000 \$		7,159 \$	63.40	0.4%		-	-	-	-	-	-	-	-	61	7,098
Over \$150k	6	7,200 \$,	2,414 \$	73.68	0.4%		-	-	-	-	-	-	-	137	417	1,860
Over \$150k	7	8,400 \$	200,000	1,373 \$	83.96	0.5%		-	-	-	-	-	-	83	268	268	755
							13,136	18,606	30,212	32,781	33,383	32,420	30,299	29,280	25,415		

Notes: 1 - Average Monthly Bills for Basic Water Service do not reflect current or porposed low income discounts

Missouri-American Water Company 2022 General Rate Case Water Affordability by Community - Bills for Basic Water Service (40 gallons per household member per day)

Median

|
 |
 | | Household
 | Avg. Monthly Bill | BTI | | | | | Cu:
 | tomers by FPL - | - | | | |
 |

--
--
63005 Chesterfield
 | Rate Zone
St. Louis County
 | Customers
5.677 | Income
\$ 176,644
 | Basic Service
\$ 28.34 | Ratio
0.19% | 0-50% | 50%-100%
71 | 100%-150%
105 | 150%-200% | 200%-250%
 | 250%-300%
164 | 300%-350% | 350%-400%
188 | 400%-450% | 450%-500% | Over 500%
4.252
 |
| 63011 Ballwin
 | St. Louis County
 | 12,799 | \$ 111,538
 | \$ 27.16 | 0.29% | 154 | 214 | 465 | 569 | 636
 | 679 | 710 | 744 | 695 | 711 | 7,221
 |
| 63017 Chesterfield
 | St. Louis County
 | | \$ 128,269
 | \$ 27.44 | 0.26% | 238 | 239 | 451 | 588 | 539
 | 558 | 582 | 602 | 595 | 591 | 8,057
 |
| 63021 Ballwin
 | St. Louis County
 | | \$ 99,020
 | \$ 26.86 | 0.33% | 196 | 336 | 739 | 927 | 1,095
 | 1,141 | 1,171 | 1,179 | 1,082 | 1,036 | 9,440
 |
| 63025 Eureka
 | St. Louis County
 | | \$ 115,933
 | \$ 27.30 | 0.28% | 4 | 5 | 8 | 10 | 12
 | 13 | 15 | 15 | 16 | 15 | 159
 |
| 63026 Fenton
63031 Florissant
 | St. Louis County
St. Louis County
 | 8,820
17,242 | \$ 87,738
\$ 66.924
 | \$ 26.35
\$ 25.44 | 0.36% | 143
445 | 274
626 | 462
1.244 | 520
1.441 | 524
1.502
 | 552
1.486 | 602
1.415 | 605
1.358 | 586
1.158 | 565
1.008 | 3,988
5.559
 |
| 63033 Florissant
 | St. Louis County
 | | \$ 61.034
 | \$ 25.11 | 0.49% | 443 | 642 | 1,244 | 1,441 | 1,302
 | 1,480 | 1,413 | 1,558 | 896 | 794 | 4.020
 |
| 63034 Florissant
 | St. Louis County
 | 6,667 | \$ 95,016
 | \$ 26.60 | 0.34% | 211 | 154 | 222 | 289 | 368
 | 407 | 459 | 472 | 455 | 447 | 3,181
 |
| 63038 Glencoe
 | St. Louis County
 | 1.830 | \$ 150.250
 | \$ 27.95 | 0.22% | 5 | 27 | 45 | 58 | 66
 | 68 | 72 | 76 | 78 | 82 | 1,253
 |
| 63040 Grover
 | St. Louis County
 | 2,794 |
 | \$ 27.58 | 0.26% | 7 | 37 | 76 | 93 | 119
 | 127 | 140 | 150 | 153 | 160 | 1,732
 |
| 63042 Hazelwood
 | St. Louis County
 | | \$ 52,612
 | \$ 24.54 | 0.56% | 213 | 301 | 449 | 564 | 603
 | 561 | 481 | 437 | 342 | 254 | 1,092
 |
| 63043 Maryland Heights
 | St. Louis County
 | 7,178 | \$ 72,940
 | \$ 25.79 | 0.42% | 153 | 206 | 445 | 513 | 572
 | 588 | 586 | 569 | 491 | 440 | 2,615
 |
| 63044 Bridgeton
 | St. Louis County
 | | \$ 74,195
 | \$ 25.73 | 0.42% | 101 | 129 | 207 | 247 | 267
 | 263 | 249 | 245 | 211 | 196 | 1,239
 |
| 63049 High Ridge
 | St. Louis County
 | | \$ 75,205
 | \$ 25.85 | 0.41% | 9 | 18 | 33 | 37 | 35
 | 36 | 36 | 35 | 32 | 30 | 189
 |
| 63074 Saint Ann
 | St. Louis County
 | | \$ 55,521
 | \$ 24.31 | 0.53% | 221 | 346 | 559 | 566 | 544
 | 512 | 502 | 431 | 402 | 269 | 992
 |
| 63088 Valley Park
63105 Saint Louis
 | St. Louis County
 | 2,445 | \$ 68,123
\$ 166.101
 | \$ 25.67
\$ 27.96 | 0.45% | 54
101 | 92
45 | 191 | 212 | 199
 | 197 | 182 | 169
105 | 139
114 | 110
112 | 899
2.016
 |
| 63114 Saint Louis
 | St. Louis County
St. Louis County
 | 13.515 |
 | \$ 27.96
\$ 24.28 | 0.20% | 669 | 45
884 | 1.418 | 1.463 | 1.482
 | 1.351 | 1.135 | 1.049 | 829 | 662 | 2,016
 |
| 63117 Saint Louis
 | St. Louis County
 | | \$ 103,834
 | \$ 26.85 | 0.31% | 96 | 69 | 124 | 165 | 156
 | 171 | 190 | 192 | 185 | 176 | 1,698
 |
| 63119 Saint Louis
 | St. Louis County
 | 11,503 | \$ 99,920
 | \$ 26.88 | 0.32% | 176 | 233 | 444 | 578 | 662
 | 672 | 703 | 701 | 681 | 649 | 6,003
 |
| 63120 Saint Louis
 | St. Louis County
 | 274 |
 | \$ 22.67 | 0.98% | 31 | 43 | 47 | 39 | 27
 | 21 | 13 | 12 | 9 | 6 | 26
 |
| 63121 Saint Louis
 | St. Louis County
 | 8,403 | \$ 44,527
 | \$ 23.88 | 0.64% | 613 | 698 | 970 | 969 | 914
 | 837 | 669 | 616 | 434 | 332 | 1,350
 |
| 63122 Saint Louis
 | St. Louis County
 | | \$ 116,446
 | \$ 27.10 | 0.28% | 76 | 102 | 171 | 198 | 220
 | 230 | 238 | 242 | 228 | 220 | 2,495
 |
| 63123 Saint Louis
 | St. Louis County
 | | \$ 67,288
 | \$ 25.40 | 0.45% | 573 | 796 | 1,217 | 1,399 | 1,517
 | 1,506 | 1,417 | 1,382 | 1,149 | 1,050 | 5,730
 |
| 63124 Saint Louis
 | St. Louis County
 | | \$ 183,839
 | \$ 28.19 | 0.18% | 81 | 19 | 62 | 90 | 102
 | 117 | 131 | 137 | 132 | 142 | 2,634
 |
| 63125 Saint Louis
 | St. Louis County
 | | \$ 57,776
 | \$ 24.77 | 0.51% | 344 | 565 | 961 | 1,080 | 1,151
 | 1,082 | 956 | 894 | 728 | 600 | 2,599
 |
| 63126 Saint Louis
 | St. Louis County
 | | \$ 84,775
 | \$ 26.35 | 0.37% | 74 | 165 | 304 | 346 | 390
 | 409 | 436 | 434 | 407 | 385 | 2,677
 |
| 63127 Saint Louis
 | St. Louis County
 | | \$ 118,822
 | \$ 26.98 | 0.27% | 55 | 63 | 81 | 90 | 84
 | 84 | 87 | 87 | 88 | 83 | 1,043
 |
| 63128 Saint Louis
 | St. Louis County
 | 10,514 |
 | \$ 26.28 | 0.37% | 133 | 329 | 625 | 654 | 700
 | 720 | 715 | 721 | 637 | 614 | 4,667
 |
| 63129 Saint Louis
63130 Saint Louis
 | St. Louis County
 | 17,337
9,702 | \$ 90,212
\$ 89,355
 | \$ 26.51
\$ 26.26 | 0.35% | 286
464 | 437
381 | 836
527 | 1,007
540 | 1,114
610
 | 1,138
614 | 1,143
578 | 1,150
568 | 1,050
477 | 1,001
440 | 8,175
4,503
 |
| 63130 Saint Louis
63131 Saint Louis
 | St. Louis County
St. Louis County
 | | \$ 89,355
\$ 176.891
 | \$ 26.26
\$ 28.15 | 0.35% | 464 | 381
83 | 130 | 540
168 | 610
191
 | 614
200 | 578 | 221 | 4// 216 | 440
241 | 4,503
 |
| 63132 Saint Louis
 | St. Louis County
St. Louis County
 | | \$ 176,891
\$ 90.470
 | \$ 28.15
\$ 26.18 | 0.35% | 148 | 185 | 273 | 282 | 308
 | 200 | 200 | 267 | 216 | 241 206 | 2,031
 |
| 63133 Saint Louis
 | St. Louis County
 | 2,240 |
 | \$ 20.18
\$ 22.41 | 1.03% | 327 | 379 | 360 | 300 | 234
 | 182 | 108 | 94 | 62 | 35 | 159
 |
| 63134 Saint Louis
 | St. Louis County
 | 4,823 | \$ 39,955
 | \$ 23.57 | 0.71% | 220 | 460 | 617 | 655 | 594
 | 516 | 413 | 354 | 280 | 174 | 540
 |
| 63135 Saint Louis
 | St. Louis County
 | 7,519 | \$ 48,151
 | \$ 24.34 | 0.61% | 449 | 488 | 836 | 834 | 777
 | 689 | 566 | 516 | 428 | 321 | 1,614
 |
| 63136 Saint Louis
 | St. Louis County
 | 13,457 | \$ 38,061
 | \$ 23.37 | 0.74% | 885 | 1,365 | 2,022 | 1,891 | 1,535
 | 1,300 | 943 | 846 | 615 | 428 | 1,627
 |
| 63137 Saint Louis
 | St. Louis County
 | 6,828 |
 | \$ 23.76 | 0.64% | 410 | 587 | 893 | 822 | 762
 | 668 | 543 | 477 | 387 | 262 | 1,017
 |
| 63138 Saint Louis
 | St. Louis County
 | 5,340 |
 | \$ 24.26 | 0.58% | 243 | 432 | 645 | 616 | 541
 | 484 | 391 | 358 | 283 | 211 | 1,138
 |
| 63140 Saint Louis
 | St. Louis County
 | | \$ 29,565
 | \$ 22.97 | 0.93% | 3 | 4 | 9 | 12 | 12
 | 8 | 2 | 2 | 1 | 1 | 3
 |
| 63141 Saint Louis
 | St. Louis County
 | | \$ 139,045
 | \$ 27.50 | 0.24% | 55 | 101 | 225 | 248 | 291
 | 278 | 275 | 268 | 271 | 250 | 3,731
 |
| 63143 Saint Louis
 | St. Louis County
 | |
 | \$ 25.15
\$ 26.50 | 0.45% | 88
74 | 156
47 | 225
119 | 211
158 | 191
190
 | 184
202 | 167
218 | 165
211 | 137
198 | 132
175 | 787
1.344
 |
| 63144 Saint Louis
 | St. Louis County
 | |
 | \$ 26.50
\$ 26.32 | | | | 119
418 | |
 | 202 | 218 | | | 1/5 466 | 1,344
3,640
 |
| 63146 Saint Louis
 | St. Louis County
St. Louis County
 | 8,139 | \$ 86,491
\$ 84,381
 | | 0.37% | 9.664 | 226 | 21 483 | 500
23.434 | 530
23,792
 | 23 132 | 21.666 | 567
20.976 | 500
18.285 | 16.292 | 126 455
 |
|
 | St. Louis County
 | 510,255 | \$ 04,501
 | \$ 23.65 | 0.37% | 5,004 | 13,000 | 21,403 | 23,434 | 25,752
 | 25,152 | 21,000 | 20,570 | 10,203 | 10,252 | 120,433
 |
| 63301 Saint Charles
 | Other
 | 1.824 | \$ 71.815
 | \$ 27.57 | 0.46% | 48 | 65 | 115 | 140 | 147
 | 145 | 140 | 135 | 118 | 103 | 667
 |
| 63303 Saint Charles
 | Other
 | 5,804 |
 | \$ 28.47 | 0.39% | 70 | 145 | 263 | 322 | 382
 | 393 | 395 | 398 | 358 | 347 | 2,731
 |
| 63304 Saint Charles
 | Other
 | | \$ 100.756
 | \$ 28.99 | 0.35% | 196 | 165 | 386 | 563 | 747
 | 795 | 839 | 869 | 814 | 817 | 6,936
 |
| 63336 Clarksville
 | Other
 | 11 | \$ 60,242
 | \$ 26.85 | 0.53% | 0 | 1 | 1 | 1 | 1
 | 1 | 1 | 1 | 1 | 0 | 3
 |
| 63348 Foristell
 | Other
 | | \$ 97,106
 | \$ 28.84 | 0.36% | 18 | 9 | 17 | 29 | 41
 | 45 | 50 | 51 | 48 | 47 | 362
 |
| 63362 Moscow Mills
 | Other
 | 158 | \$ 79,349
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Missouri-American Water Company 2022 General Rate Case Historical Water Affordability

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019		2020		2021	Rate Yea	ır
MO Revenue	\$ 141,267,228 \$	154,084,017	\$ 182,439,094	\$ 172,053,851	\$ 179,670,809	\$ 174,130,824	\$ 183,937,731	\$ 183,626,565	\$ 199,951,336	\$ 205,328,788	\$2	27,963,883	\$ 22	25,280,295 \$	314,829,884	Γ.
MO Customers	417,693	417,705	419,449	423,430	423,208	424,515	426,650	428,788	431,003	431,738		433,979		434,592	441,002	1
MO Median Income	\$ 45,817 \$	45,774	\$ 49,764	\$ 46,303	\$ 56,630	\$ 59,196	\$ 55,016	\$ 56,885	\$ 61,726	\$ 60,597	\$	61,901	\$	62,953 \$	66,456	j.
MO Customer Median Income	\$ 62,262 \$	62,203	\$ 67,626	\$ 62,922	\$ 76,956	\$ 80,443	\$ 74,763	\$ 77,302	\$ 83,881	\$ 82,347	\$	84,119	\$	85,549 \$	90,309	J
MO Average Monthly Bill	\$ 28.18 \$	30.74	\$ 36.25	\$ 33.86	\$ 35.38	\$ 34.18	\$ 35.93	\$ 35.69	\$ 38.66	\$ 39.63	\$	43.77	\$	43.20 \$	59.49	,
MO BTI Ratio	0.54%	0.59%	0.64%	0.65%	0.55%	0.51%	0.58%	0.55%	0.55%	0.58%		0.62%		0.61%	0.79%	6





Note 1: Table H-8 Median Household Income by State: 1984 to 2020 U.S. Census Bureau

Note 2: 1.3589 MO adjustment factor to reflect the difference between statewide income and income for MO customers

2022 Missouri-American Water Company General Rate Case Residential Usage Analysis - St. Louis County

REGRESSION MODEL

SUMMARY OUTPUT

Regression Sta	tistics								
Multiple R	0.9401								
R Square	0.8838								
Adjusted R Squ	0.8658								
Standard Error	0.6471								
Observations	120								

	df	SS	MS	F	Significance F
Regression	16	328.149	20.509	48.971	9.8273E-41
Residual	103	43.137	0.419		
Total	119	371.286			

	Coefficients Sta	ndard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	5.5139	0.2620	21.0437	0.0000	4.9943	6.0336
Jan	-0.4343	0.2903	-1.4961	0.1377	-1.0099	0.1414
Feb	-0.8408	0.2904	-2.8955	0.0046	-1.4168	-0.2649
Mar	-0.7148	0.2906	-2.4602	0.0155	-1.2911	-0.1386
April	-0.9710	0.2903	-3.3449	0.0011	-1.5467	-0.3952
May	-0.5515	0.2899	-1.9024	0.0599	-1.1264	0.0234
Jun	0.4574	0.2898	1.5786	0.1175	-0.1173	1.0321
Jul	1.2015	0.2917	4.1190	0.0001	0.6230	1.7801
Aug	2.7991	0.2917	9.5953	0.0000	2.2205	3.3776
Sep	3.0006	0.2917	10.2856	0.0000	2.4221	3.5792
Oct	2.2581	0.2918	7.7393	0.0000	1.6795	2.8368
Nov	0.2635	0.2894	0.9106	0.3646	-0.3105	0.8375
Trend	-0.0096	0.0024	-4.0971	0.0001	-0.0143	-0.0050
Drought	2.3629	0.3816	6.1922	0.0000	1.6061	3.1197
Rain	-0.2360	0.0570	-4.1401	0.0001	-0.3491	-0.1230
CDD	0.0017	0.0017	1.0271	0.3068	-0.0016	0.0050
COVID	0.1309	0.2062	0.6349	0.5269	-0.2780	0.5398

2022 Missouri-American Water Company General Rate Case Residential Usage Analysis - Non St. Louis County

REGRESSION MODEL

SUMMARY OUTPUT

istics									
0.9533									
0.9088									
0.8946									
0.3993									
120									

ANOVA					
	df	SS	MS	F	Significance F
Regression	16	163.665	10.229	64.155	4.55763E-46
Residual	103	16.423	0.159		
Total	119	180.088			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	3.4487	0.1616	21.3373	0.0000	3.1281	3.7692
Jan	0.3930	0.1791	2.1942	0.0305	0.0378	0.7482
Feb	-0.1306	0.1792	-0.7289	0.4677	-0.4860	0.2248
Mar	-0.1585	0.1793	-0.8843	0.3786	-0.5141	0.1970
April	0.0249	0.1790	0.1390	0.8897	-0.3301	0.3798
May	0.3261	0.1789	1.8231	0.0712	-0.0286	0.6809
Jun	1.6051	0.1788	8.9775	0.0000	1.2505	1.9596
Jul	2.3800	0.1800	13.2221	0.0000	2.0230	2.7370
Aug	2.5751	0.1800	14.3060	0.0000	2.2181	2.9321
Sep	1.9973	0.1800	11.0951	0.0000	1.6403	2.3543
Oct	1.2554	0.1800	6.9730	0.0000	0.8984	1.6125
Nov	0.2525	0.1786	1.4139	0.1604	-0.1017	0.6067
Trend	-0.0082	0.0015	-5.6620	0.0000	-0.0111	-0.0053
Drought	0.9512	0.2361	4.0282	0.0001	0.4829	1.4196
Rain (Diff)	-0.2358	0.0388	-6.0778	0.0000	-0.3127	-0.1588
CDD (Diff)	0.0064	0.0011	5.8139	0.0000	0.0042	0.0086
COVID	0.3305	0.1270	2.6030	0.0106	0.0787	0.5823

2022 Missouri-American Water Company General Rate Case Commercial Usage Analysis - St. Louis County

Schedule CBR-5 Page 1 of 2

REGRESSION MODEL

SUMMARY OUTPUT

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120

	df	SS	MS	F	Significance F
Regression	16	17827.227	1114.202	81.509	6.32083E-51
Residual	103	1407.973	13.670		
Total	119	19235.200			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	35.4462	1.4988	23.6493	0.0000	32.4736	38.4187
Jan	-5.8703	1.6583	-3.5398	0.0006	-9.1592	-2.5813
Feb	-7.4899	1.6591	-4.5144	0.0000	-10.7804	-4.1994
Mar	-4.2091	1.6600	-2.5355	0.0127	-7.5013	-0.9168
Apr	-5.9039	1.6583	-3.5603	0.0006	-9.1927	-2.6151
May	-3.6235	1.6562	-2.1879	0.0309	-6.9081	-0.3389
Jun	5.7794	1.6554	3.4912	0.0007	2.4962	9.0625
Jul	13.8002	1.6659	8.2837	0.0000	10.4962	17.1042
Aug	27.9224	1.6660	16.7603	0.0000	24.6183	31.2265
Sep	21.0292	1.6661	12.6215	0.0000	17.7248	24.3336
Oct	15.4621	1.6664	9.2787	0.0000	12.1572	18.7671
Nov	7.2129	1.6535	4.3622	0.0000	3.9336	10.4923
Trend	-0.0104	0.0135	-0.7686	0.4439	-0.0371	0.0164
Drought	8.0196	2.1408	3.7461	0.0003	3.7738	12.2654
Rain	-1.3041	0.2534	-5.1457	0.0000	-1.8068	-0.8015
CDD	0.0430	0.0109	3.9349	0.0002	0.0213	0.0647
COVID	-3.4180	1.1809	-2.8945	0.0046	-5.7600	-1.0760

2022 Missouri-American Water Company General Rate Case Commercial Usage Analysis - Non St. Louis County

REGRESSION MODEL

SUMMARY OUTPUT

Regression Statistics					
Multiple R	0.9530				
R Square	0.9082				
Adjusted R Squ	0.8940				
Standard Error	1.7158				
Observations	120				

ANOVA					
	df	SS	MS	F	Significance F
Regression	16	3001.769	187.611	63.724	6.21892E-46
Residual	103	303.242	2.944		
Total	119	3305.012			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	21.5573	0.6997	30.8075	0.0000	20.1695	22.9450
Jan	-0.2267	0.7761	-0.2920	0.7709	-1.7660	1.3127
Feb	-1.1466	0.7700	-1.4890	0.1395	-2.6737	0.3806
Mar	-0.3096	0.7704	-0.4018	0.6886	-1.8375	1.2184
Apr	1.0907	0.7692	1.4180	0.1592	-0.4348	2.6163
May	0.9352	0.7687	1.2167	0.2265	-0.5892	2.4596
Jun	5.5597	0.7683	7.2364	0.0000	4.0360	7.0834
Jul	10.2487	0.7719	13.2769	0.0000	8.7178	11.7796
Aug	12.6180	0.7719	16.3457	0.0000	11.0870	14.1489
Sep	10.6228	0.7720	13.7598	0.0000	9.0917	12.1539
Oct	7.3491	0.7721	9.5177	0.0000	5.8177	8.8805
Nov	1.3967	0.7674	1.8201	0.0717	-0.1252	2.9186
Trend	0.0077	0.0064	1.2068	0.2303	-0.0049	0.0203
Drought	2.1248	0.8964	2.3703	0.0196	0.3469	3.9026
Rain (Diff)	-0.5815	0.1321	-4.4005	0.0000	-0.8436	-0.3194
CDD (Diff)	0.0234	0.0054	4.3045	0.0000	0.0126	0.0342
COVID	-0.6231	0.5496	-1.1337	0.2595	-1.7132	0.4669

2022 Missouri-American Water Company General Rate Case OPA Usage Analysis - St. Louis County

REGRESSION MODEL

SUMMARY OUTPUT

Regression Statistics				
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	df	SS	MS	F	Significance F
Regression	16	90900.762	5681.298	44.354	7.99777E-39
Residual	103	13193.375	128.091		
Total	119	104094.137			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	41.9364	4.5898	9.1368	0.0000	32.8335	51.0393
Jan	-22.0107	5.0764	-4.3359	0.0000	-32.0786	-11.9428
Feb	-20.2464	5.0788	-3.9864	0.0001	-30.3191	-10.1738
Mar	-10.9965	5.0816	-2.1640	0.0328	-21.0746	-0.9184
Apr	-24.8516	5.0753	-4.8966	0.0000	-34.9173	-14.7859
May	-11.9491	5.0698	-2.3569	0.0203	-22.0038	-1.8944
Jun	16.5533	5.0675	3.2666	0.0015	6.5031	26.6035
Jul	29.9510	5.1002	5.8725	0.0000	19.8359	40.0661
Aug	60.2884	5.1004	11.8204	0.0000	50.1730	70.4038
Sep	34.1208	5.1008	6.6893	0.0000	24.0046	44.2371
Oct	28.9290	5.1016	5.6706	0.0000	18.8111	39.0468
Nov	8.0136	5.0616	1.5832	0.1164	-2.0250	18.0521
Trend	0.0134	0.0413	0.3252	0.7457	-0.0684	0.0953
Drought	17.4370	6.5933	2.6447	0.0095	4.3607	30.5132
Rain (Diff)	-2.9459	0.8447	-3.4877	0.0007	-4.6211	-1.2708
CDD (Diff)	0.1287	0.0343	3.7572	0.0003	0.0608	0.1967
COVID	-6.5469	3.6182	-1.8094	0.0733	-13.7228	0.6290

2022 Missouri-American Water Company General Rate Case OPA Usage Analysis - Non St. Louis County

REGRESSION MODEL

SUMMARY OUTPUT

Regression Statistics					
Multiple R	0.9077				
R Square	0.8239				
Adjusted R Squ	0.7965				
Standard Error	5.8593				
Observations	120				

ANOVA					
	df	SS	MS	F	Significance F
Regression	16	16539.579	1033.724	30.110	1.23224E-31
Residual	103	3536.115	34.331		
Total	119	20075.694			

	Coefficients	Standard Error	t Stat	P-value	Lower 95%	Upper 95%
Intercept	41.4706	2.3753	17.4592	0.0000	36.7598	46.1815
Jan	-1.9713	2.6281	-0.7501	0.4549	-7.1835	3.2409
Feb	-0.1060	2.6293	-0.0403	0.9679	-5.3206	5.1086
Mar	0.4184	2.6307	0.1591	0.8739	-4.7990	5.6359
Apr	1.6834	2.6264	0.6409	0.5230	-3.5254	6.8921
May	5.4476	2.6247	2.0755	0.0404	0.2420	10.6531
Jun	14.1667	2.6235	5.3999	0.0000	8.9636	19.3697
Jul	22.9036	2.6405	8.6739	0.0000	17.6668	28.1405
Aug	28.1250	2.6406	10.6511	0.0000	22.8881	33.3620
Sep	26.3725	2.6408	9.9866	0.0000	21.1351	31.6099
Oct	23.4004	2.6412	8.8598	0.0000	18.1622	28.6386
Nov	6.7026	2.6204	2.5578	0.0120	1.5055	11.8996
Trend	-0.0175	0.0214	-0.8191	0.4146	-0.0599	0.0249
Drought	2.2530	3.4152	0.6597	0.5109	-4.5202	9.0263
Rain (Diff)	-1.9477	0.4889	-3.9838	0.0001	-2.9174	-0.9781
CDD (Diff)	0.0325	0.0190	1.7095	0.0904	-0.0052	0.0701
COVID	-3.7743	1.8691	-2.0193	0.0461	-7.4812	-0.0673

Resolution Endorsing Consideration of Alternative Regulation that Supports Capital Investment in the 21st Century for Water and Wastewater Utilities

WHEREAS, Through the *Resolution Supporting Consideration of Regulatory Policies Deemed as "Best Practices"* (2005), the National Association of Regulatory Utility Commissioners (NARUC) has previously recognized the important role of innovative regulatory policies and mechanisms in facilitating the efforts of water and wastewater utilities to address their significant infrastructure investment challenges; *and*

WHEREAS, Traditional cost of service ratemaking, which has worked reasonably well in the past for water and wastewater utilities, no longer adequately addresses the challenges of today and tomorrow. Revenue, driven by declining use per customer, is flat to decreasing, while the nature of investment (rate base) has shifted largely from plant needed for serving new customers to non-revenue producing infrastructure replacement and compliance with new drinking water standards; *and*

WHEREAS, The traditional cost of service model is not well adapted to a no/low growth, high investment utility environment and is unlikely to encourage the necessary future investment in infrastructure replacement; *and*

WHEREAS, Compared to the water and wastewater industry, the electric and natural gas delivery industries have in place a larger number and a greater variety of alternative regulation policies, such as multiyear rate plans and rate stabilization programs, and those set forth in the 2005 Resolution; *and*

WHEREAS, The U.S. water industry is the most capital intensive sector of regulated utilities and faces critical investment needs that are expected to total \$335 billion to \$1 trillion over the next quarter century, as noted in the *American Society of Civil Engineers 2013 Report Card for America's Infrastructure; and*

WHEREAS, Tap water is physically ingested and the quality of the service must be maintained to protect the health and economic well-being of communities across our Nation and comply with current and future regulations covering the control of a number of contaminants from nitrosamines to chromium, at a cost estimated at \$42 billion by the EPA as part of their April 2013 Report to Congress; *and*

WHEREAS, Alternative regulatory mechanisms can enhance the efficiency and effectiveness of water and wastewater utility regulation by reducing regulatory costs, increasing rates for customers, when necessary, on a more gradual basis; and providing the predictability and regulatory certainty that supports the attraction of debt and equity capital at reasonable costs and maintains that access at all times; *now, therefore be it*

RESOLVED, That the National Association of Regulatory Utility Commissioners, convened at its 125th Annual Meeting in Orlando, Florida, supports consideration of alternative regulation plans and mechanisms along with and in addition to the policies and mechanisms outlined in the