MoPSC 0022

DATA INFORMATION REQUEST Missouri-American Water Company WR-2022-0303 General Rate Case

Requested From: Brian LaGrand

Date Requested: 07/07/2022

Information Requested:

For January 2020 to current, please provide the following: (a) a quantification of the compensation that American Water Resources has paid to MAWC for each customer list that it has received (and all updated customer lists). Please indicate the dates when any such amounts of compensation were received; (b) provide a copy of all supporting documentation MAWC relied upon to determine the amount of compensation that it received; (c) provide, by month, the amount of revenue that American Water Resources has collected from MAWC's customers and all expenses that it has incurred in relation to MAWC's customers from the time that it first offered the program to each MAWC water and sewer operating district through current with updates through December 31, 2022.

Requested By: Keith Foster (keith.foster@psc.mo.gov)

- (a) \$0. A customer list has not been provided since 2003.
- (b) See (a).
- (c) On July 18, 2022. MAWC objected to part (c) of the data request for the following reasons: a) the responsive information is not relevant to the subject proceeding, not proportional to the needs of the case considering the totality of the circumstances, nor reasonably calculated to lead to the discovery of admissible evidence in that it requests information about a company that is not regulated by the Missouri Public Service Commission; and, b) the information is beyond MAWC's possession, custody, and control.

Responsible Witness: John Watkins