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Case No.: WR-2026-0304
SR-2026-0305
Date: July 1, 2026

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2026-0304

CASE NO. SR-2026-0305

DIRECT TESTIMONY

OF

DEBA F. ATHER

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

AFFIDAVIT

I, Deba Ather under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am a Principal, Regulatory Services of 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.



Deba Ather

July 1, 2026
Dated

**DIRECT TESTIMONY
DEBA F. ATHER
MISSOURI AMERICAN WATER COMPANY
CASE NO.: WR-2026-0304
CASE NO.: SR-2026-0305**

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DIRECT TESTIMONY

DEBA F. ATHER

I. INTRODUCTION

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Q. Please state your name and business address.

A. My name is Deba F. Ather, and my business address is 1 Water Street, Camden, NJ 08102.

Q. By whom are you employed and in what capacity?

A. I am employed by American Water Works Service Company, Inc. (“Service Company” or “AWWSC”) as Principal, Regulatory Services. The Service Company is a wholly owned subsidiary of American Water Works Company, Inc. (“American Water”) that provides services to its affiliates, including Missouri-American Water Company (“MAWC,” “Missouri-American,” or the “Company”).

Q. Please summarize your educational background and business experience.

A. I received a Bachelor of Science degree in Environmental Science from Rutgers University, New Brunswick. I have been employed by Service Company since March 2023 in my current role. Prior to my employment with Service Company, I worked in various roles for a global satellite company, followed by PECO Energy, an electric and gas utility under the parent company Exelon. I joined PECO’s Safety department in 2013 as a Senior Business Analyst. Over the next 10 years, I held various positions of increasing responsibility within the Safety, Human Performance, and Regulatory Performance departments.

Q. What are your current employment responsibilities?

A. Since joining AWWSC in 2023, my duties consist of preparing, assisting, and reviewing regulatory filings and related activities, centering on the concept of affordability, for regulated subsidiaries of American Water. My responsibilities include the preparation of

1 written testimony, exhibits, and work papers in support of rate applications and other
2 regulatory filings as well as responding to data requests for American Water's regulated
3 subsidiaries, including MAWC.

4 **Q. Have you previously testified before the Missouri Public Service Commission?**

5 A. No.

6 **Q. Have you previously testified before other public utility regulatory agencies?**

7 A. Yes. I sponsored testimony regarding affordability of service on behalf of Virginia-
8 American Water Company in its most recent general rate case, Case No. PUR-2025-00185,
9 Pennsylvania-American Water Company in its most recent general rate case, Case No. R-
10 2025-3057983/R-2025-3058051, and Kentucky-American Water Company in Docket No.
11 2025-00122. I also sponsored testimony regarding revenues, cost of service, rate design
12 and affordability of service on behalf of Maryland-American Water Company in Docket
13 No. 9808 – GRC (2025). In addition, during my employment with PECO Energy, I testified
14 before the Pennsylvania Public Utility Commission as a company witness in formal
15 complaint hearings.

16 **Q. What is the purpose of your direct testimony in this proceeding?**

17 A. The purpose of my Direct Testimony is to sponsor and testify in support of MAWC's
18 affordability studies for water and wastewater service.

19 **Q. Please identify the schedules you will be sponsoring and for which you will be
20 providing testimony.**

21 A. I am sponsoring Schedule DFA-1: Water Affordability Analysis and Schedule DFA-2:
22 Wastewater Affordability Analysis.

1 **Q. Were each of these schedules prepared by you or under your direction and**
2 **supervision?**

3 A. Yes.

4 **II. AFFORDABILITY OF SERVICE**

5 **Introduction**

6 **Q. Please describe the concept of affordability.**

7 A. The concept of affordability for water and wastewater service is based on the idea that
8 everyone should have access to drinking water and wastewater service that is (1) safe,
9 meaning it complies with the U.S. Safe Drinking Water Act and regulations promulgated
10 by the U.S. Environmental Protection Agency (“EPA”); (2) reliable, so that it is resilient
11 in the face of floods, droughts, and other climate risks; and (3) affordable, meaning that
12 these services should be priced such that families and households can pay for these services
13 without undue economic hardship.

14 **Q. Why is the affordability of water and wastewater service an important issue to the**
15 **Company?**

16 A. The Company knows that its water and wastewater service is vital and that it must make
17 necessary investments to continue to provide safe and reliable water and wastewater
18 service. The Company also knows how important it is for its service to remain affordable.
19 Maintaining affordability of service is an important objective for MAWC as discussed in
20 the Direct Testimony of Company witness Svindland.

21 **Q. Please describe the Company’s approach in assessing the affordability of its water**
22 **and wastewater service.**

1 A. The Company assesses the affordability of its water and wastewater service by comparing
2 annual bills for water and wastewater service to household income in the communities that
3 we serve. Using this as a foundation, the Company's assessment of affordability is made
4 up of two complementary analyses. The first analysis is an Enterprise-Level analysis of
5 affordability, which considers the affordability of Missouri-American's service at a high
6 level over a multi-year period. The second analysis is a Community-Level analysis of
7 affordability which is a more in-depth analysis than the Enterprise-Level analysis with a
8 narrower focus. The Community-Level analysis looks at the affordability of service at
9 proposed rates in this case for individual groups of customers using the most currently
10 available household information on income, size, and ownership status from the U.S.
11 Census Bureau and usage assumptions consistent with usage levels being used to set
12 proposed rates in this case. Both analyses are further discussed below.

13 **Q. Why are both of these approaches to assessing affordability of service important?**

14 A. Both of these approaches are important because, together, they provide a complete and
15 comprehensive picture of the affordability of the Company's services to its customers. The
16 Enterprise-Level analysis provides a historical and forward-looking view of the
17 affordability of service over time but does not address affordability concerns for lower
18 income or other subsections of customers. The Community-Level analysis, in contrast,
19 addresses the affordability of service for lower income customers and other individual
20 groups of customers, but does not provide a historical perspective on how affordability of
21 service has been trending over time. Taken separately, these components provide useful
22 and important information but do not provide a complete picture of the affordability of the

1 Company's service. Taken together, these components provide a complete and
2 comprehensive picture of the affordability of the Company's services to its customers.

3 **Q. Has the Company provided an affordability analysis of its water and wastewater**
4 **service for the proposed rates in this case?**

5 A. Yes. The Company's affordability study for water service is provided in Schedule DFA-1
6 and the affordability study for wastewater service is provided in Schedule DFA-2. Each
7 schedule contains both the Enterprise-Level Analysis and a Community-Level Analysis for
8 the applicable service.

9 **Q. Please summarize the conclusions of the Company's affordability analysis for the**
10 **proposed rates in this case.**

11 A. There are three conclusions that can be drawn from the Company's affordability study:

12 1. The affordability of the Company's water and wastewater service from 2012
13 through the test year indicates that the way the Company has invested in and
14 managed its water and wastewater systems has been for the long-term benefit of
15 our customers.

16 2. The Company's water and wastewater service has been, is, and is expected to
17 continue to be affordable for the vast majority of its residential customers, including
18 under the rates proposed in this case.

19 3. There are, however, groups of customers for whom the affordability of water and
20 wastewater service can be challenging.

21 **Q. How did the Company perform its affordability analysis?**

1 A. Such an assessment requires at least two data points – the average monthly or annual bill
2 for water and wastewater service and some measure of household income for the customer
3 population. From these two data points, a metric is developed called the Bill-to-Income
4 (“BTI”) Ratio, which is defined as annual water bills divided by estimated annual
5 household income. For the broader residential customer base, commonly available
6 household income measures are measures of income at different percentiles. Median
7 Household Income (“MHI”), which is household income at a 50th percentile level (50% of
8 households in a given population have incomes greater than the median and 50% of
9 households have incomes lower than the median), can be measured at a statewide or
10 community level and can be paired with a data set that provides the number of customers
11 served in each community to arrive at a weighted number that represents MHI for the
12 Company’s entire service territory.

13 At a more detailed level, individual household income, household size, and home
14 ownership data is considered across a full range of households. Using this information,
15 affordability can then be assessed at a more detailed level based on various income levels
16 and bill amounts for water and/or wastewater service. A variety of household information
17 on income, size, and ownership status is readily and publicly available from the U.S.
18 Census Bureau and the American Community Survey (“ACS”) at the national, state,
19 county, and community levels.

20 **Q. Is there a generally accepted standard for the affordability of water and wastewater**
21 **services?**

22 A. Historically, water and wastewater affordability has been evaluated using numerous
23 methods and metrics with no specific method being academically recognized as a right or

1 wrong approach for assessing affordability. Of the various methods utilized, bill to income
2 ratios along with an established percentage of income dedicated to water and wastewater
3 service has been the predominant approach for assessing affordability. In general, bills
4 have been considered to be unaffordable when they exceed a specified threshold in the
5 range of 2% to 4.5% of annual income. In a recent 2024 national water and wastewater
6 affordability analysis report to Congress, the EPA used bills resulting in 3% and 4.5% of
7 annual income as thresholds to define combined water and wastewater bills as affordable.¹

8 **Enterprise-Level Analysis**

9 **Q. Please describe the company's Enterprise-Level Analysis of affordability of service.**

10 A. The Enterprise-Level Analysis of affordability for water and wastewater service is a
11 historical comparison of average monthly bills to household income for the Company's
12 residential customers. This view looks at average monthly residential bills for all
13 customers over time compared to MHI for the Company's residential customer base.

14 **Q. What is the purpose and value of this Enterprise-Level Analysis?**

15 A. The purpose of the Enterprise-Level Analysis is to provide a high-level historical
16 perspective on how the affordability of service has been trending over time and how it is
17 expected to continue to trend under proposed rates. Although the Company proposes to
18 increase customer rates in this proceeding, the important metric to consider is the impact
19 that proposed rates and bills have on customer finances and how those impacts have
20 trended over time and are expected to trend going forward. This metric must consider not
21 only trends in rates and bills but trends in household income. The value of the BTI Ratio

¹ U.S. EPA. (2024) Water Affordability Needs Assessment: Report to Congress. (Report No. 830-R-24-015).
Pages 33 - 36.

1 metric proposed by the Company is that it considers all of these factors. The Company's
2 BTI Ratio as presented in the Company's affordability analyses is therefore the appropriate
3 metric to use when looking at the impact of the Company's rates for water and wastewater
4 service on customers.

5 **Q. Why do you use average monthly residential bills in your Enterprise-Level Analysis?**

6 A. Average monthly bills are used because this is the best representation of the total revenue
7 the Company has collected from its residential customers over time, which is in turn the
8 best metric on which to evaluate the total affordability picture for residential customers.
9 Average monthly bills consider total residential revenue along with the total number of
10 customers each year that revenue is collected from and the total level of water sales each
11 year that revenue amount is collected over. This provides the most complete representation
12 of what customers have paid in the past and what they may be expected to pay in the future
13 for the Company's water and wastewater service.

14 **Q. Why do you use MHI in your Enterprise-Level Analysis?**

15 A. The Enterprise-Level Analysis uses MHI for two reasons. The first is that MHI is a widely
16 recognized, well understood, and readily available measure of household income in
17 different communities and states and is available for different breakdowns of household
18 demographics (homeowners versus renters, for example). The second is that MHI is
19 consistent in scope with the concept of average monthly bills, which is the first input in the
20 analysis that I previously discussed. Average monthly bills encompass all residential
21 customers, not a subset. MHI also encompasses the entire residential customer base, not a
22 subset. It is important in any analysis of affordability that there is consistency in
23 assumptions between bills used in the analysis and household income metrics used in the

1 analysis. This is something that many analyses of affordability of water and wastewater
2 service do not consider. Use of MHI as a measure of total population income brings that
3 consistency to the analysis when paired with average monthly bills.

4 **Q. How do you determine MHI for the customers in the Company's service territory?**

5 A. The MHI for the Company's service territory is a weighted average of the number of
6 customers the Company serves in each community in the service territory and the median
7 household income in each of those communities for owner-occupied and single-unit,
8 renter-occupied homes as reported by data in the ACS based on the most recent year's
9 available data (2024 in this proceeding). The relationship between this service territory
10 specific figure and the MHI for the State of Missouri for 2024 (also provided at the
11 community level through the ACS) is then applied to historical MHI data for the State of
12 Missouri to arrive at historical MHI data for the MAWC service territory.

13 **Q. What are the results of your Enterprise-Level Analysis of affordability for water
14 service?**

15 A. The charts below compare historical average monthly water bills to MHI for MAWC
16 customers from 2012 through 2025 stated in absolute terms and stated in terms of BTI
17 Ratio, along with estimated average monthly bills under the Company's proposed rates in
18 this case and estimated MHI for MAWC customers during the test year. The data shows
19 that the BTI Ratio for water service for MAWC customers has remained under 1% and is
20 expected to be at 1.01% under the Company's proposed rates in this case.

CHART 1

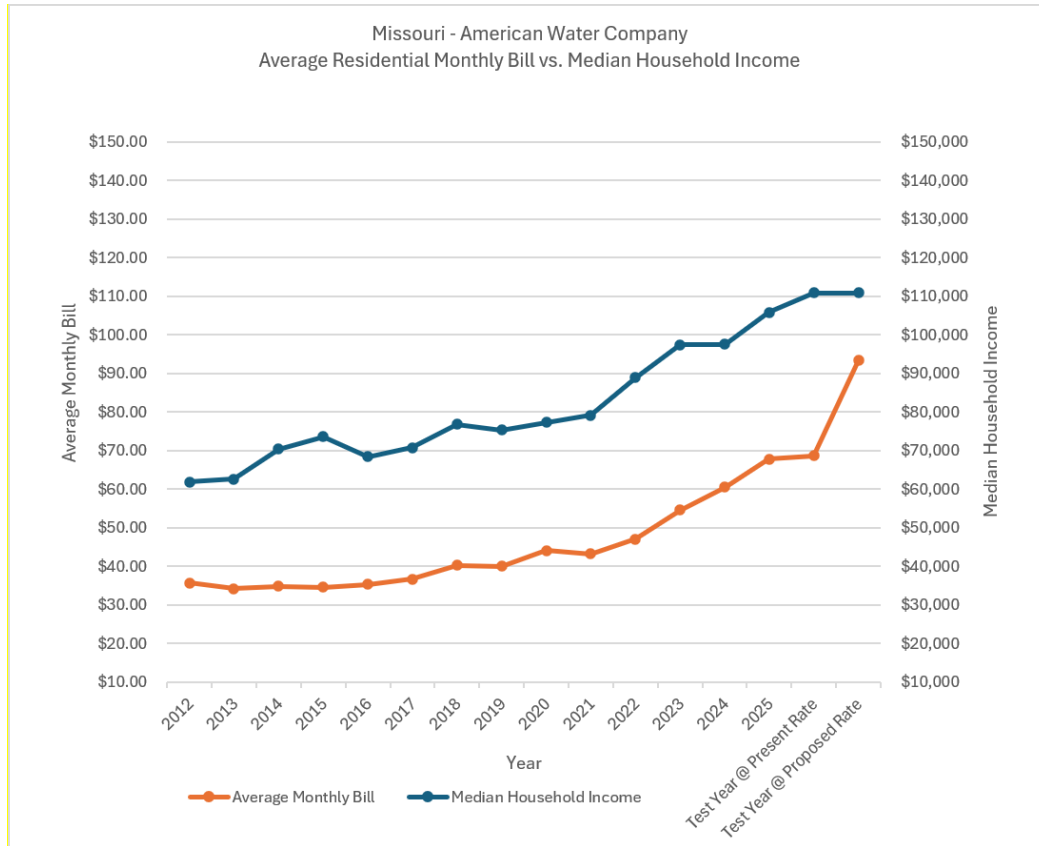
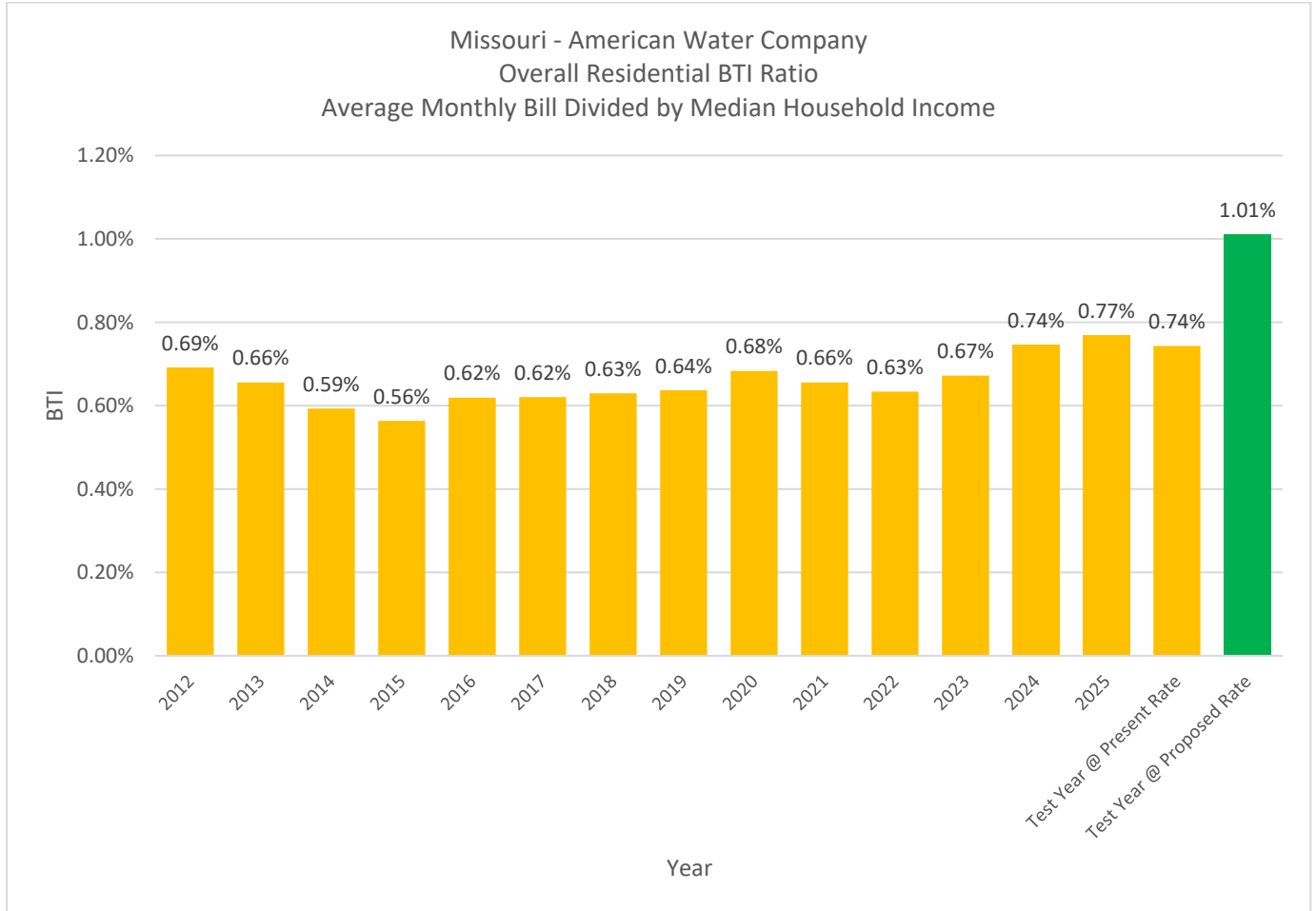


CHART 2



2 **Q. What are the results of your Enterprise-Level analysis of affordability for wastewater**
 3 **service?**

4 A. The charts below compare historical average monthly wastewater bills to MHI for MAWC
 5 customers from 2012 through 2025 stated in absolute terms and stated in terms of BTI
 6 Ratio, along with estimated average monthly bills under the Company’s proposed rates in
 7 this case and estimated MHI for MAWC customers during the test year. The data shows
 8 that the BTI Ratios for wastewater service for MAWC customers has remained under 1%
 9 for the past 10 years and is expected to be at 1.04% under the Company’s proposed rates
 10 in this case.

CHART 3

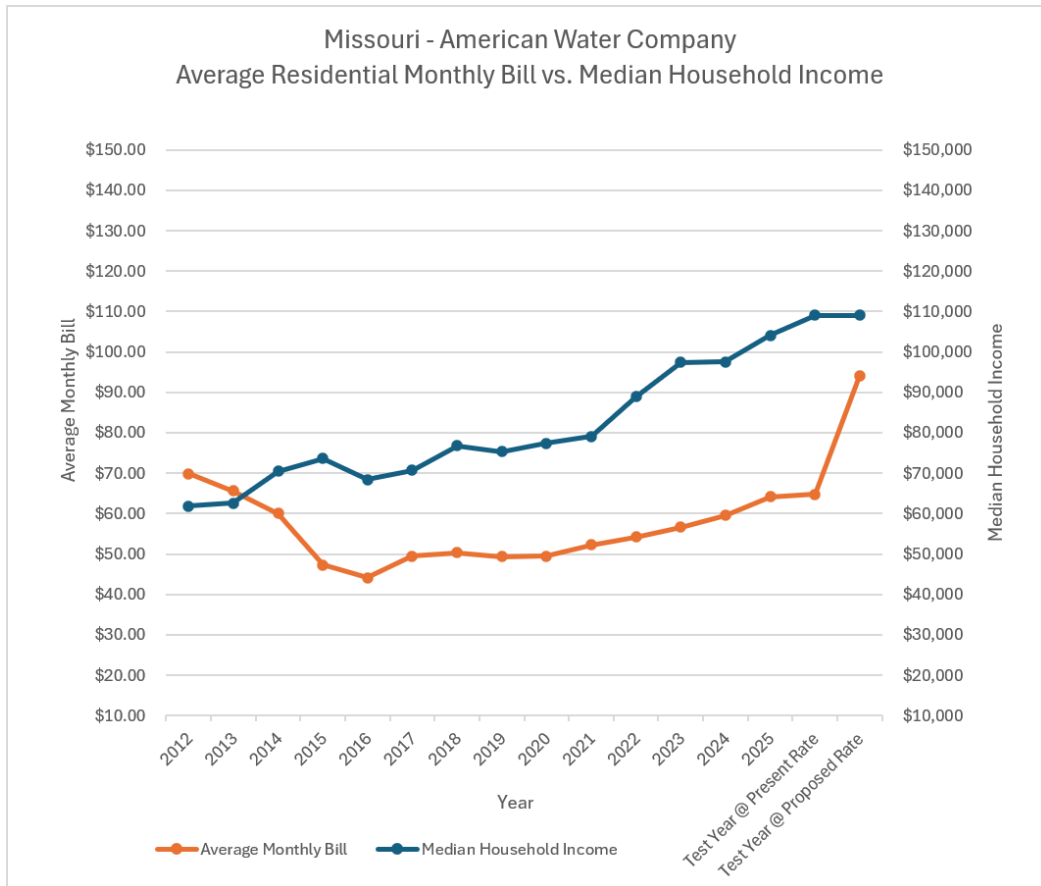
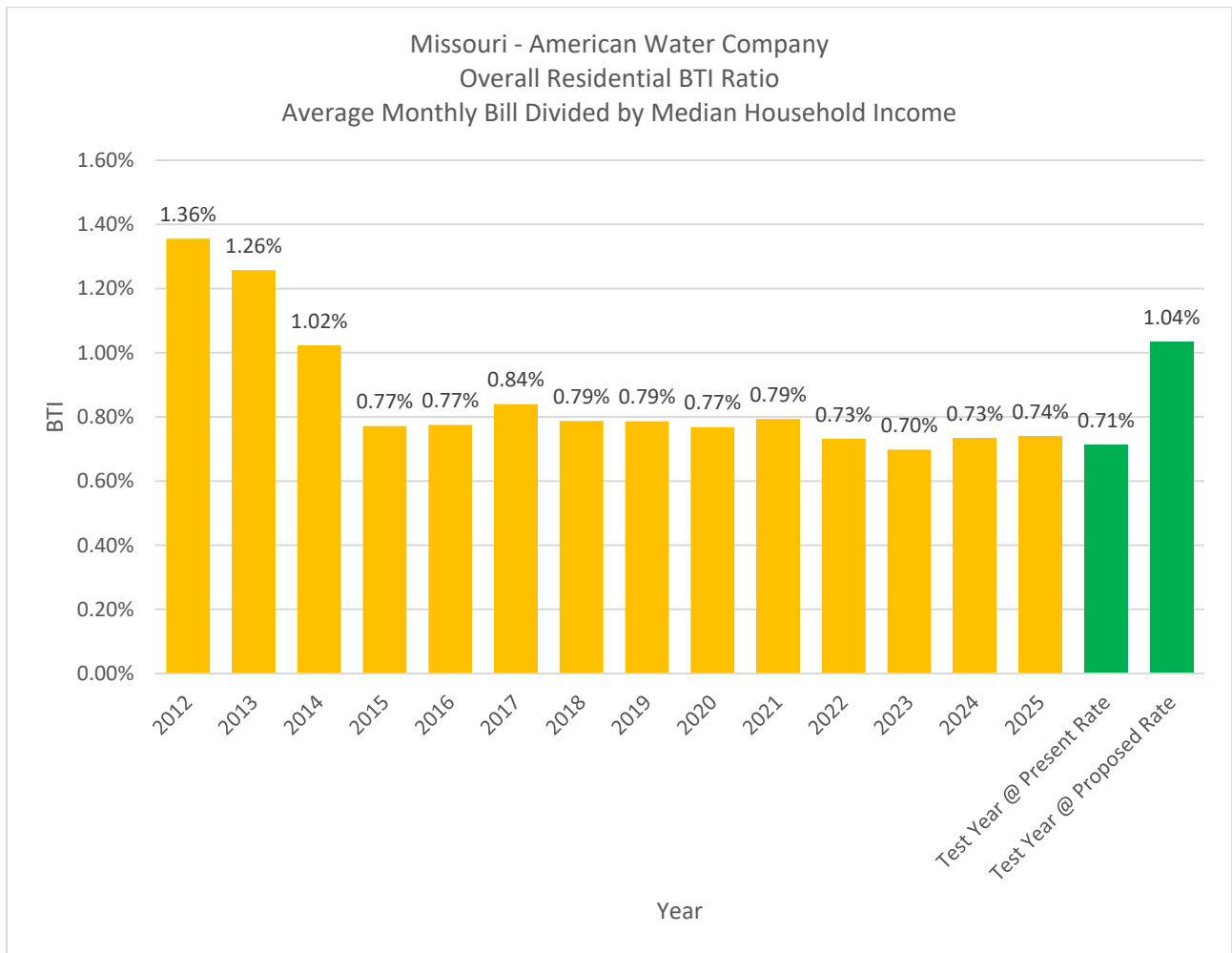


CHART 4



1 **Q. Does the Enterprise-Level Analysis indicate whether service is affordable or**
2 **unaffordable, in your opinion?**

3 A. Not necessarily. The overall assessment of the affordability of service is not a yes or no
4 question. The affordability of water or wastewater service will never be that simple. One
5 can generally measure average water bills against any given benchmark and come up with
6 a yes or no answer, but affordability of service is a continuum, and that is what the
7 Company's Community-Level analysis shows, as further detailed below. There will

1 always be customers for whom water and/or wastewater service is more affordable than
2 for others depending on demographics and income levels. This is true across all of the
3 communities that MAWC serves, including the wealthiest of communities the Company
4 serves.

5 **Q. Does your Enterprise-Level Analysis speak at all to the affordability of service for**
6 **lower income customers?**

7 A. No, it does not, and it is not intended to. The Enterprise-Level analysis is one component
8 of the Company's comprehensive analysis of affordability in this proceeding, and, as
9 explained above, it is not intended to target any specific customer group. The Enterprise-
10 Level analysis is intended to show the long-term impact of changes in rates and usage on
11 the general affordability of water and wastewater service for our customers. Specific
12 examination of the affordability of the Company's water and wastewater service for
13 different customer groups, and specifically for lower income customers, is the focus of the
14 Company's Community-Level analysis, which I describe next.

15 **Community-Level Analysis**

16 **Q. Please describe the Company's Community-Level Analysis of affordability of service.**

17 A. The Community-Level Analysis takes a deeper dive into the affordability of water and
18 wastewater service at a more granular level. The Community-Level analysis looks at the
19 affordability of service at proposed rates in this case for individual groups of customers
20 using the most current available information on household income, size, and home
21 ownership data from the U.S. Census Bureau and usage assumptions consistent with usage

1 levels being used to set proposed rates in this case. This analysis is done community by
2 community at a zip-code level.

3 **Q. What is the purpose of this Community-Level Analysis?**

4 A. The purpose of the Community-Level Analysis is twofold. The first is to estimate at the
5 community or zip code level the number of customers the Company serves at different
6 levels of household income stated in terms of multiples of the Federal Poverty Level
7 (“FPL”). The second is to estimate, by community and household income level, the number
8 of customers for whom bills for Basic Water Service (which I will define later in my
9 testimony) is expected to be different percentages of household income at the Company’s
10 proposed rates.

11 **Q. How is this analysis different from the Enterprise-Level Analysis you previously
12 presented?**

13 A. The Enterprise-Level Analysis and the Community-Level Analysis are two different but
14 complementary views of affordability. As previously stated, the purpose of the Enterprise-
15 Level analysis is to provide a high-level historical perspective on how the affordability of
16 service has been trending over time and how it is expected to continue to trend under
17 proposed rates. The Community-Level analysis is a deeper but narrower view of
18 affordability that looks specifically at proposed rates in this case and the most currently
19 available household demographic information across the Company’s service territory.

20 **Q. Is there academic research that supports the Company’s approach to assessing the
21 affordability of service at this detailed level?**

1 A. Yes. Cardoso and Wichman outline a framework for assessing affordability of water
2 service that uses the full distribution of household income at the local level rather than MHI
3 or some other static representative level of income and uses varying levels of water usage
4 at the individual household level instead of a static representative level of water usage.²
5 While the methodology presented here differs from Cardoso and Wichman in certain areas,
6 the goal remains the same, which is to analyze affordability at the individual customer level
7 and identify customer groups where affordability of service may be an issue.

8 **Q. What information is needed to conduct an analysis of the affordability of service at**
9 **this detailed level?**

10 A. The following information is used to assess the affordability of service at the community
11 and individual customer level:

- 12 • The number of customers served in each community.
- 13 • The distribution of owner-occupied households and renter-occupied households by
14 income level in each community.
- 15 • The percentage of occupied housing units that are owner-occupied households or
16 renter-occupied households that are not in multi-dwelling buildings in each
17 community.
- 18 • The average number of persons per household in each community for both owner-
19 occupied and renter-occupied households.
- 20 • The distribution of the size of households (one-person, two-person, etc.) for
21 households of different income levels.

² Cardoso, Diego S. and Wichman, Casey J., “Water Affordability in the United States,” Water Resources Research, vol. 58, issue 12 (2020).

- 1 • The standard definition of Basic Water Service.
- 2 • Current or proposed rate structures.

3 I will return to the Community-Level Analysis after I discuss the concept of Basic
4 Water Service.

5 **Q. Please describe the concept of Basic Water Service.**

6 A. For this analysis, we define Basic Water Service (“BWS”) to be water that is used for
7 indoor domestic use and is expected to be relatively constant from month to month (e.g.
8 water needed for drinking, cooking, cleaning, sanitation, etc.). This differentiates BWS
9 from total water sales, which also includes discretionary outdoor use of water in the
10 summertime (lawn maintenance, swimming, recreation, etc.) which is not usually the focus
11 of public policy discussions on the affordability of water service.

12 **Q. How do you define BWS for the purposes of your Community-Level affordability**
13 **analysis?**

14 A. For the purpose of the Company’s affordability analysis, BWS is defined to be 40 gallons
15 of water per household member per day. This is based on the Water Research Foundation
16 2026 Residential End Uses Of Water study which shows that average daily use per capita
17 in single family homes is now under 40 gallons per day.³

18

19 **Q. Is this definition of BWS also suitable for wastewater analysis?**

20 A. Yes. The definition of BWS at 40 gallons per household member per day is also suitable
21 for wastewater analysis because wastewater billings are based on the same type of service

³ Water Research Foundation 2026 Residential End Uses Of Water: A Single-Family and Multi-Family Study
Version 3

1 that BWS is meant to represent, namely water needed for cooking, cleaning, sanitation, etc.
2 All of this service effectively is returned through the wastewater collection system and,
3 therefore, the definition of BWS serves as an appropriate benchmark for analysis of
4 affordability for wastewater service.

5 **Q. Why is it important that both household size and household income be considered in**
6 **this analysis?**

7 A. Household size and household income are both important because FPL, which is the
8 measure of household income most often used as a metric for affordability studies and
9 customer assistance programs, depends on both household size and income. Also, because
10 water consumption in the home increases as the number of people in the home increases
11 and because lower income households tend to have fewer people in them on average, it is
12 important to differentiate between larger households and small households at different
13 levels of income in conducting the affordability analysis.

14 **Q. Can you discuss FPL in more detail?**

15 A. FPL is a measurement set by the U.S. Department of Health and Human Services of the
16 minimum amount of annual income that is needed for individuals and families to pay for
17 essentials, such as room and board, clothes, and transportation. The FPL considers the
18 number of people in a household, their income, and the state in which they live. For the
19 State of Missouri, the FPL guidelines for 2026 are set at \$15,960 for a household size of
20 one and \$5,680 per year for each additional household member.

21 **Q. What information does your Community-Level Analysis provide?**

1 A. The Community-Level Analysis produces a complete set of data that consists of estimates
2 for the number of customers in the Company's service territory by community and zip
3 code, and then by annual household income and household size within each community
4 and zip code. From this, the number of customers by multiples of FPL can also be
5 estimated. Also included in this data is a bill amount at proposed rates differentiated by
6 household size that reflects the Company's assumed level of BWS that I described earlier.
7 From this, BTI Ratios can then be estimated by income level and household size, and by
8 multiples of FPL, for each community and zip code the Company serves.

9 **Q. What does your Community-Level Analysis show?**

10 A. Charts 5 and 6 below respectively show, for both water and wastewater service, the
11 percentage of residential customers for whom bills for Basic Water Service under the
12 Company's proposed rates are expected to be at different multiples of household income.

13

CHART 5

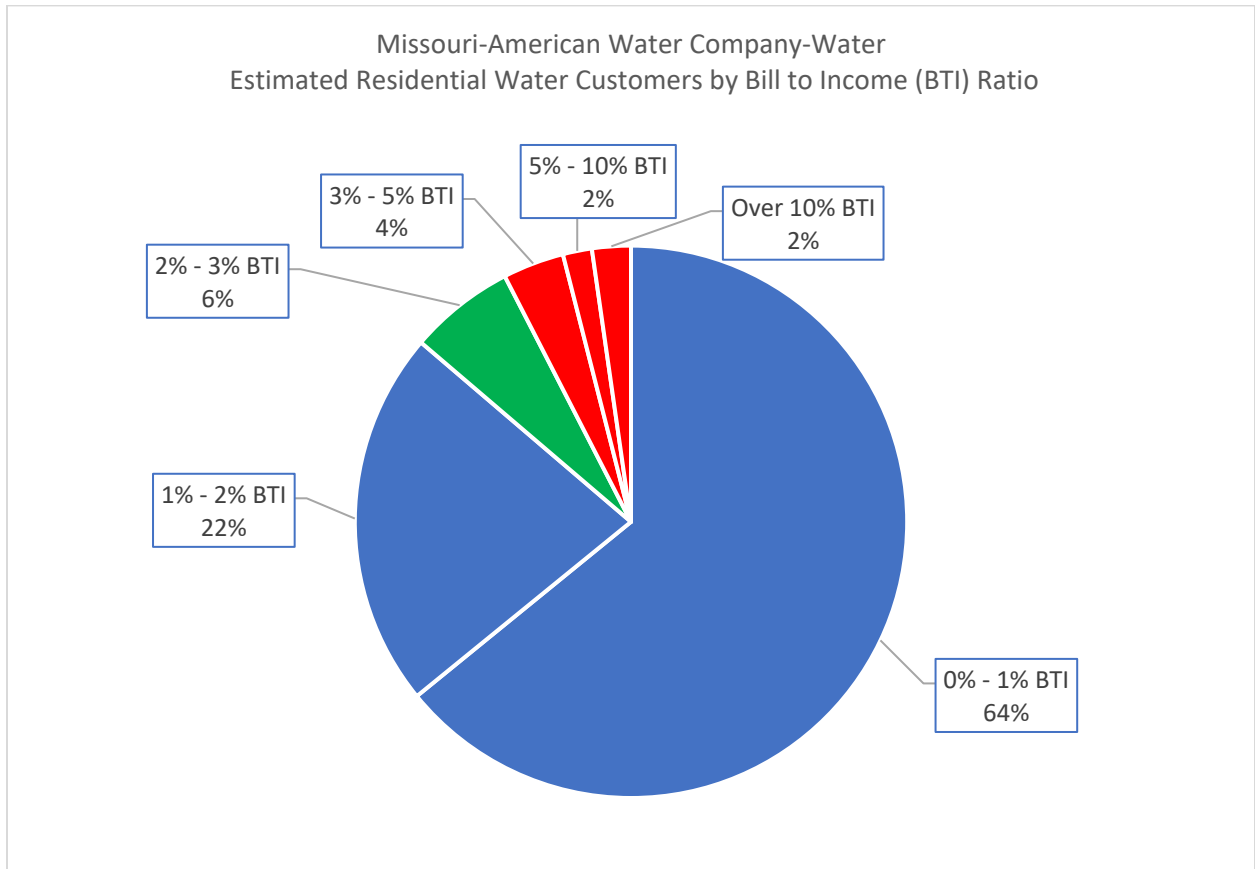
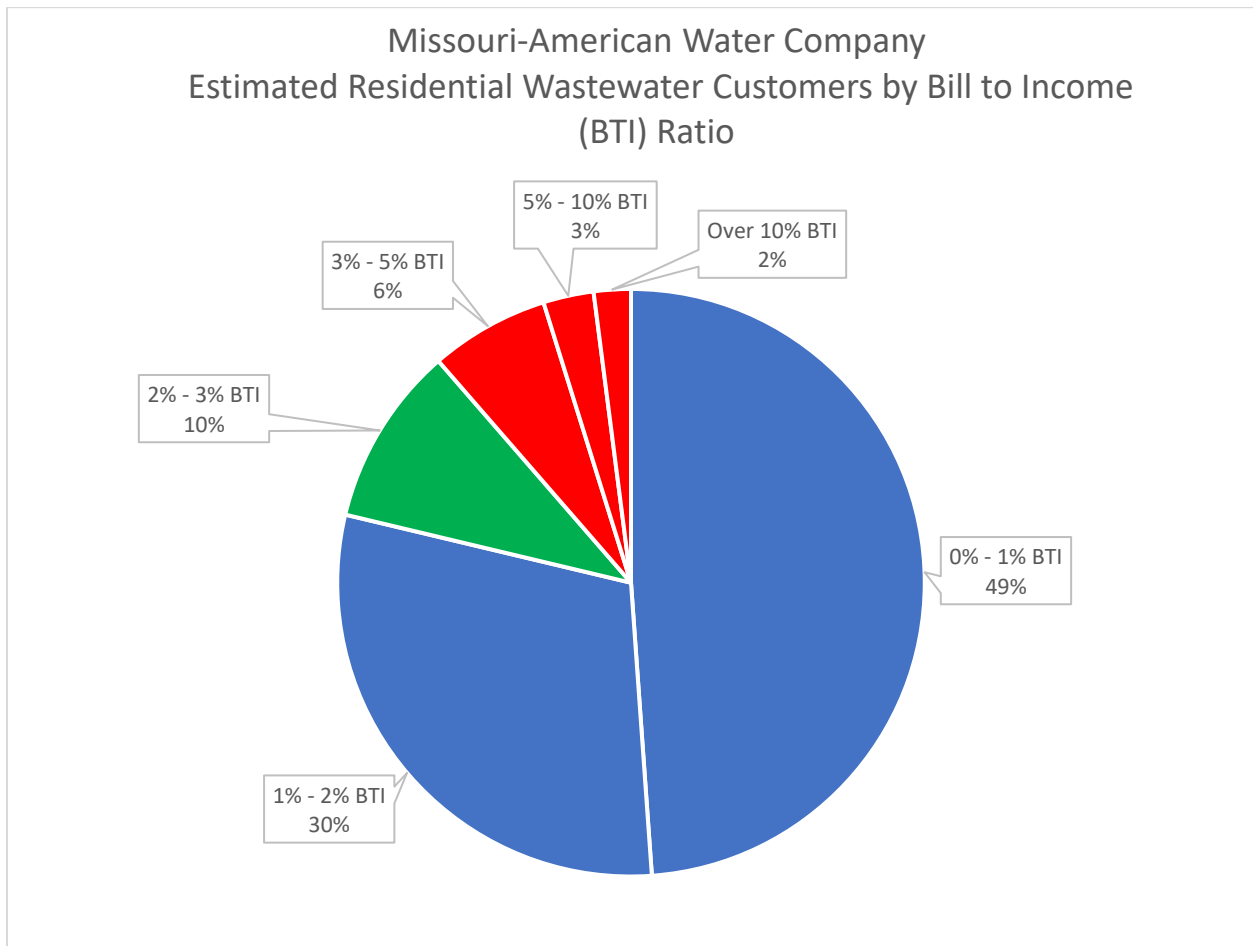


CHART 6



1 These charts show that under the Company’s proposed rate structure, the Affordability
2 Index metric (discussed below) for the Company’s service territory in total is 86% under
3 proposed rates for water service and 79% under proposed rates for wastewater service,
4 meaning that 86% of our residential water customers and 79% of our residential wastewater
5 customers can expect to see bills for Basic Water Service to be less than 2% of their
6 household income. The Company estimates that there are approximately 62,056 residential
7 water customers and 5,749 wastewater customers that will see bills for Basic Water Service

1 above 2% of their household income, which is approximately 14% and 21% of the total
2 customer population for water and wastewater service, respectively.

3 **Q. Please describe the Affordability Index.**

4 A. The Affordability Index (“AI”) is a metric that reflects the percentage of a group of
5 customers for whom BWS is expected to be less than a given percentage of annual
6 household income. Consistent with my previous discussion regarding standards for
7 affordability, the Company uses 2% of household income as the benchmark for this metric,
8 which is at the conservative end of the range of affordability often cited. As an example,
9 if, for a certain group of customers, it is estimated that 80% of those customers will have
10 bills for BWS less than 2% of annual household income, the AI value for that group of
11 customers is 80%.

12 The AI metric is designed to reflect the percentage of residential customers in a state,
13 community, or demographic group for whom BWS is expected to cost 2% or less of annual
14 household income. An AI value of 100% means that all customers within a selected group
15 can expect BWS at less than 2% of annual household income. An AI value of 70% means
16 that approximately 70% of customers within a selected group can expect BWS at less than
17 2% of annual household income, and 30% of customers in that group can expect BWS to
18 cost more than 2% of annual household income. The AI value is calculated based on
19 modeling of proposed rates and community-level household information described above.

20 **Q. Why do you use 2% of annual household income as your benchmark for affordability**
21 **of service?**

1 A. The 2% benchmark is frequently used as an industry standard for the affordability threshold
2 of an individual household. This percentage of MHI standard has become the common
3 water affordability standard used today.

4 **Q. Does your analysis consider customers who rent in multi-family buildings without
5 individual meters?**

6 A. No. The Company's Community-Level Analysis only considers customers that are
7 assumed to be direct customers of the Company, meaning that they are directly responsible
8 for payment of services to the Company. Direct customers are assumed to be owner-
9 occupied households and single-family, renter-occupied households as reported by ACS
10 data.

11 **Q. Why does your Community-Level Analysis only concentrate on customers that are
12 direct customers of the Company?**

13 A. For indirect customers of the Company (e.g., renters in multi-family buildings), it is
14 impossible to know definitively what these households pay in rent for water and wastewater
15 service. Presumably, building owners that receive water and wastewater service from
16 MAWC are recovering those costs through rents, but rents are generally market-based and
17 not cost-based with property owners charging what the market will bear. There is no way
18 to know if owners are overcharging or undercharging renters or if they are also charging
19 renters for building water or wastewater service that renters themselves are not actually
20 using.

21 **Q. Will the Company's proposed change in rates have an impact on people who use the
22 Company's service but are not direct customers of the Company?**

1 A. It is impossible to know what the impact of the Company’s proposed rates will be on
2 indirect customers of the Company. Rents may increase in part to recover increases in
3 water service costs, but rents change for many reasons, and the extent to which any
4 increases can be attributable to the Company’s proposed rates and the timing of such
5 increases cannot be determined.

6 **III. CONCLUSION**

7 **Q. How is this affordability information useful?**

8 A. Assessing affordability information of water and wastewater service for the entire
9 residential customer population can demonstrate whether customers, in general, are having
10 or would have difficulty paying their water bills under the Company’s current or proposed
11 tariff structure. Assessing affordability information about water and wastewater service
12 for lower-income customers can indicate the number of customers that may be having
13 trouble paying their utility bills, where the customers are in the Company’s service
14 territory, and the extent to which those bills may pose challenges. This can, in turn, inform
15 decision-makers about the size and scope of efforts that may be needed to help these
16 vulnerable customers better afford water and wastewater service, both in terms of general
17 rate design proposals that can reduce the cost of BWS for all customers, including lower-
18 income customers, and customer assistance programs that may include customer grants,
19 tariff discounts, levelized billing, and outreach programs. Company witness Svindland
20 discusses the Company’s existing programs that help our more financially vulnerable
21 customers pay their bills.

22 **Q. What conclusions do you draw based on the Company’s Enterprise-Level and**
23 **Community-Level affordability studies?**

1 A. As noted above, there are three conclusions that can be drawn from the Company's
2 affordability study:

3 1. The affordability of the Company's water and wastewater service from 2012
4 through the test year indicates that the way the Company has invested in and
5 managed its water and wastewater systems has indeed been for the long-term
6 benefit of our customers.

7 2. The Company's water and wastewater service has been, is, and is expected to
8 continue to be affordable for the majority of its residential customers, including
9 under the rates proposed in this case.

10 3. There are, however, groups of customers for whom the affordability of water and
11 wastewater service can be challenging.

12 **Q. Does the Company's affordability analyses provide any additional useful information**
13 **about the value of the Company's water and wastewater service?**

14 A. Indeed, it does. All stakeholders (regulators, customers, consumer advocates, community
15 leaders, employees, shareholders, etc.) benefit from a financially sound utility providing
16 safe, reliable, and affordable service to its customers. The Company's analysis
17 demonstrates that MAWC's management of its operations and maintenance costs and its
18 decisions on how to execute on the capital investments needed to provide safe and reliable
19 water and wastewater services have been and continues to be done in a responsible and
20 effective manner and continues to result in reasonable rates for our customers.

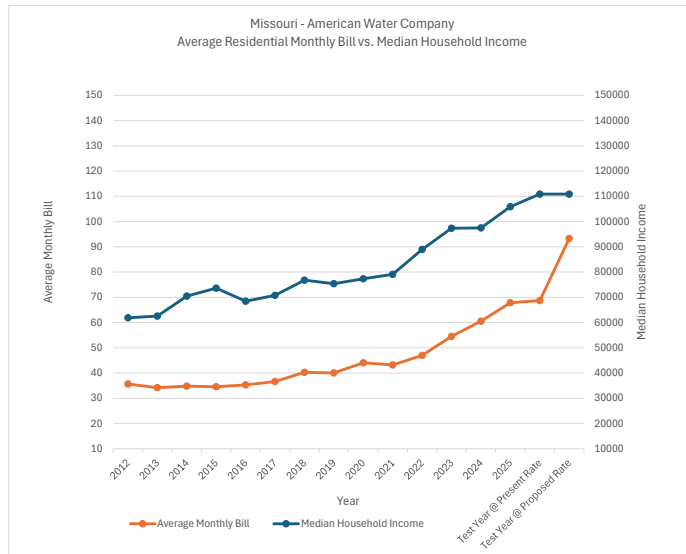
21 **Q. Does this conclude your Direct Testimony?**

22 A. Yes, it does.

Missouri-American Water Company
Docket No. WR-2026-0304
Water Affordability Summary - Bills for Basic Water Service

Residential Statistics	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Test Year @ 2025 Present Rate	Test Year @ Proposed Rate	
MO Revenue	\$179,376,179	\$172,912,380	\$176,905,398	\$175,999,379	\$180,421,563	\$188,108,822	\$207,944,816	\$207,277,294	\$229,011,045	\$226,393,743	\$246,824,726	\$289,288,947	\$322,679,883	\$362,557,825	\$374,166,921	\$508,197,034
MO Customers	38,072,177	33,391,295	32,445,029	31,360,336	30,933,541	32,947,131	33,195,818	29,143,580	31,073,628	29,934,923	30,763,288	31,121,838	30,274,690	29,872,910	29,496,535	29,496,535
MO Statewide Median Income	419,015	421,422	423,485	424,041	425,926	428,295	430,147	431,658	433,292	434,592	437,777	441,951	444,356	445,346	453,960	453,960
	\$49,760	\$50,310	\$56,630	\$59,200	\$55,020	\$56,890	\$61,730	\$60,600	\$62,180	\$63,590	\$71,520	\$78,290	\$78,390	\$82,258	\$86,168	\$86,168
MO Customer Median Income																
MO Average Monthly Bill	\$ 61,891	\$ 62,576	\$ 70,436	\$ 73,633	\$ 68,434	\$ 70,760	\$ 76,780	\$ 75,374	\$ 77,339	\$ 79,093	\$ 88,957	\$ 97,377	\$ 97,501	\$ 105,860	\$ 110,892	\$ 110,892
MO BTI Ratio	\$ 4.71	\$ 5.18	\$ 5.45	\$ 5.61	\$ 5.83	\$ 5.71	\$ 6.26	\$ 7.11	\$ 7.37	\$ 7.53	\$ 8.02	\$ 9.30	\$ 10.66	\$ 12.14	\$ 12.69	\$ 17.23
	\$ 35.67	\$ 34.19	\$ 34.81	\$ 34.59	\$ 35.30	\$ 36.60	\$ 40.29	\$ 40.02	\$ 44.04	\$ 43.22	\$ 46.98	\$ 54.55	\$ 60.51	\$ 67.84	\$ 68.69	\$ 93.29
	7.57	6.60	6.38	6.16	6.05	6.41	6.43	5.63	5.98	5.74	5.86	5.87	5.68	5.59	5.41	5.41
	0.69%	0.66%	0.59%	0.56%	0.62%	0.62%	0.63%	0.64%	0.68%	0.66%	0.63%	0.67%	0.74%	0.77%	0.74%	1.01%

1.287 State adjustment factor to reflect the difference between statewide MHI and MHI for AW customers in the state



Missouri-American Water Company
Docket No. WR-2026-0304
Water Affordability Summary - Bills for Basic Water Service
Customer Counts as of December 31, 2025

Affordability Target: 2.0%

Total	Household			0-50%	50%-100%	100%-150%	150%-200%	200%-250%	250%-300%	300%-350%	350%-400%	400%-450%	450%-500%	Over 500%
	Step 1	Step 2	Size											
125,132	12	-	1	7,077	9,111	11,176	10,162	10,913	9,392	8,511	7,142	7,132	6,231	38,285
156,877	15	9	2	4,401	4,865	7,991	9,861	10,032	10,322	12,894	8,766	8,772	7,592	71,382
70,338	15	21	3	2,046	2,613	4,074	5,006	6,217	4,997	4,716	4,334	4,519	4,515	27,302
58,349	15	33	4	1,193	1,917	3,600	4,644	4,337	5,137	4,745	4,008	4,011	3,678	21,081
25,482	15	45	5	787	1,554	2,461	2,421	2,667	2,365	1,714	2,260	1,847	1,850	5,556
9,998	15	57	6	344	782	1,148	1,180	1,105	903	890	726	731	1,094	1,095
5,221	15	69	7	140	453	628	664	547	609	522	417	627	416	199

\$0-\$5k	10,068	10,068	0%
\$5-\$10k	5,227	5,227	0%
\$10-\$15k	11,011	11,011	0%
\$15-\$20k	10,319	9,661	6%
\$20-\$25k	12,322	4,897	60%
\$25-\$35k	27,199	9,955	63%
\$35-\$50k	45,601	7,964	83%
\$50-\$75k	72,595	3,139	96%
\$75-\$100k	58,734	134	100%
\$100-\$150k	84,069	-	100%
Over \$150k	114,252	-	100%
Total	451,397	62,056	86%

Missouri American Water Company
Docket No. SR-2026-0305
Wastewater Affordability Analysis

Residential Statistics	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Test Year @ 2025 Present Rate	Test Year @ Proposed Rate	
MO Revenue	\$2,584,237	\$3,040,757	\$3,211,617	\$4,494,294	\$6,177,430	\$7,183,783	\$7,915,919	\$8,276,290	\$8,443,278	\$9,360,593	\$12,013,467	\$14,770,677	\$16,133,352	\$17,350,786	\$21,297,134	\$30,932,319
MO Customers	3,081	3,865	4,458	7,917	11,650	12,092	13,095	13,960	14,217	14,912	18,456	21,739	22,596	22,528	27,415	27,415
MO Statewide Median Income	49,760	50,310	56,630	59,200	55,020	56,890	61,730	60,600	62,180	63,590	71,520	78,290	78,390	82,116	86,020	86,020
MO Customer Median Income	\$ 61,891.49	\$ 62,575.58	\$ 70,436.39	\$ 73,632.96	\$ 68,433.88	\$ 70,759.78	\$ 76,779.77	\$ 75,374.28	\$ 77,339.48	\$ 79,093.24	\$ 88,956.58	97377.102	97501.482	104067.5876	109014.3699	109014.3699
MO Average Monthly Bill	\$ 69.91	\$ 65.57	\$ 60.03	\$ 47.31	\$ 44.19	\$ 49.51	\$ 50.37	\$ 49.40	\$ 49.49	\$ 52.31	\$ 54.24	56.62213575	59.49973148	64.18324819	64.73686581	94.0249236
MO BTI Ratio	1.36%	1.26%	1.02%	0.77%	0.77%	0.84%	0.79%	0.79%	0.77%	0.79%	0.73%	0.70%	0.73%	0.74%	0.71%	1.04%

1.267321 State adjustment factor to reflect the difference between statewide MHI and MHI for AW customers in the state

