

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

In the Matter of the Application of)	
Confluence Rivers Utility Operating)	File No. WM-2020-0403
Company, Inc., to Acquire Certain Water)	& SM-2020-0404
and Sewer Assets.)	

**MOTION TO SUSPEND CURRENT SCHEDULE, REQUEST FOR NOTICE TO CUSTOMERS, AND
REQUEST FOR LOCAL PUBLIC HEARING**

The Office of the Public Counsel (“OPC”) moves to suspend the current procedural schedule, and request a customer notice and local public hearing as follows:

1. On June 12, 2020, Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers) applied for the authority to acquire the water and sewer assets of Terre Du Lac Utilities Corporation (TDL).

2. On September 18, 2020, the Staff of the Public Service Commission (“Staff”) recommended that the acquisition be approved so long as the Commission also denies Confluence River’s concurrent request for an acquisition incentive. In the *Memorandum* attached to that recommendation, Staff noted as follows:

It is Staff’s understanding that, at the present time, there have been no notifications or meetings held to inform the customers of the pending case.

3. The OPC believes TDL’s customers should be notified of the proposed acquisition and given an adequate forum to provide their comments directly to the Commission. Therefore, the OPC requests that the Commission (1) suspend the current schedule for this case including the need for responses to Staff’s recommendation to be filed within ten days of the date it was filed, (2) order Confluence Rivers to notify all TDL customers of the proposed acquisition, and (3) set dates for a local public hearing to be held in this matter. OPC notes that the Commission held a

virtual public hearing just recently for another proposed water and sewer system acquisition by Confluence Rivers in WM-2020-0282, and likewise in WR-2020-0264 and WR-2020-0344.

WHEREFORE, the OPC respectfully requests the Commission suspend the current schedule, order notice of the pending acquisition be sent to customers, and set dates for a local public hearing, virtual or otherwise.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Caleb Hall
Caleb Hall, #68112
Senior Counsel
200 Madison Street, Suite 650
Jefferson City, MO 65102
P: (573) 751-4857
F: (573) 751-5562
Caleb.hall@opc.mo.gov

**Attorney for the Office of the Public
Counsel**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 21st Day of September, 2020, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall