

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

Stoddard County Sewer Company, Inc.,	)		
R.D. Sewer Co., LLC and the Staff of the	)		
Missouri Public Service Commission for an	)	<b>Case No.</b>	<b>SO-2008-0289</b>
Order Authorizing Stoddard County Sewer	)		
Co., Inc., to Transfer its Assets to R.D. Sewer	)		
Co., LLC and for Interim Rate Increase	)		

**STAFF’S MOTION FOR MODIFICATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and submits this *Motion for Modification* to the Missouri Public Service Commission (Commission) and states the following in support:

1. On October 23, 2008, the Commission issued a *Report and Order (Order)* in Case No. SO-2008-0289 with an effective date of November 2, 2008.
2. The *Order* included “the Commission shall further require R.D. Sewer to file a subsequent small company rate increase request no later than three years following the effective date of this order.” As a result, R.D. Sewer Co., LLC (R.D. Sewer or Company) has been ordered to file a new rate case by November 2, 2011.
3. Rodger and LaDawn Owens own and operate R.D. Sewer and three water companies (Oakbrier Water Company, Whispering Hills Water System and Lakeland Heights Water Company).
4. The owners informed Staff that while R.D. Sewer is able to file a small rate increase by November 2, 2011, the Company would prefer to wait ninety (90) days so that it may file for a rate increase for all four utilities at one time.
5. Staff believes allowing R.D. Sewer ninety (90) days to file is reasonable and provides for economic use of resources for the companies, Staff, and the Office of the Public Counsel (Public

Counsel). Allowing all four companies to come in at one time ensures that all of the books and records are reviewed at the same time, that the owners can focus their time on the rate cases, and that any allocations among the utilities are properly accounted for in the rate cases.

6. The undersigned Staff counsel discussed this request with Public Counsel and that office has no objection to this modification.

**WHEREFORE**, Staff respectfully submits this *Motion for Modification* for the Commission's information and consideration and requests that a modification to the *Order* be granted to allow R.D. Sewer an additional ninety (90) days to file a small company rate increase request.

Respectfully submitted,

/s/ Rachel M. Lewis

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**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 26th day of October, 2011.

/s/ Rachel M. Lewis