

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

In the Matter of the Application of	)	
Ridge Creek Water Company, LLC	)	
for a Certificate of Convenience and	)	Case No. WA-2015-0182
Necessity authorizing it to construct,	)	
install, own, operate, control, manage,	)	
and maintain a water system for the	)	
public located in an unincorporated	)	
area in Pulaski County, Missouri	)	

**APPLICANT’S REQUEST FOR EVIDENTIARY HEARING**

**COMES NOW** Ridge Creek Water Company, LLC (hereinafter “Company” or “Applicant”) and submits the following to the Missouri Public Service Commission (“Commission”):

1. On May 22, 2015 Staff filed *Staff’s Recommendation* in this case. On June 5, 2015, the Commission set a deadline of June 19, 2015 for parties to submit responses to the *Staff’s Recommendation* and a deadline of June 24, 2015 for parties to submit requests for evidentiary hearing.

2. On pages 5 through 6 of its recommendation, Staff submitted a recommendation concerning the Company’s revenue requirement and rates for service. In evaluating the Company’s costs of service, the Staff did not include data or figures to account for a management salary, for system repairs and maintenance, and engineering fees. Staff included disputable cost estimates for several unquestionable expenses including meter reading, accounting fees, and telephone expense.

3. On June 10, 2015, the Company and the Staff met to discuss the differences between their respective calculations of the Company’s revenue requirement.

4. On June 19, 2015, the Company filed its Response to Staff’s Recommendation, and submitted a schedule showing differences between the Company’s expense run and the Staff’s. The

schedule illustrates that Staff has significantly underestimated the Company's actual costs of providing service.

5. Because there is a wide gulf between Staff and the Company regarding revenue requirement, further discovery and an evidentiary hearing are justified.

WHEREFORE, Ridge Creek Water Company, LLC respectfully requests the Commission to set this matter for hearing.

Respectfully submitted

**/s/ Mark W. Comley**

Mark W. Comley, Mo. Bar #28847  
Newman, Comley & Ruth P.C.  
601 Monroe Street, Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
(573) 634-2266 (voice)  
(573) 636-3306 (facsimile)  
[comleym@ncrpc.com](mailto:comleym@ncrpc.com)

Attorneys for Ridge Creek Water Company,  
LLC

**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 24<sup>th</sup> day of June, 2015, to Thais Ann Folta at [thais.folta@ago.mo.gov](mailto:thais.folta@ago.mo.gov); Mueth, Marcella at [marcella.mueth@psc.mo.gov](mailto:marcella.mueth@psc.mo.gov); General Counsel's Office at [staffcounservice@psc.mo.gov](mailto:staffcounservice@psc.mo.gov); Christina Baker at [christina.baker@ded.mo.gov](mailto:christina.baker@ded.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov).

**/s/ Mark W. Comley**