BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of House Springs Sewer Company, Inc., and Jefferson County)
Public Sewer District for Approval of House Springs Sewer Company, Inc., to Sell Company Assets to) File No. <u>SM-2016-0204</u> 3
Jefferson County Public Sewer District, in Connection) I I focus beau fear
with Other Related Transactions.) MAR 0 7 2016

MOTION TO INTERVENE

Missouri Public Service Commission

COMES NOW INTERVENOR, the Missouri Department of Natural Resources (the Department), pursuant to 4 CSR 240-2.075, and hereby respectfully requests that the Missouri Public Service Commission grant this Motion to Intervene in this matter. In support of this Motion, Intervenor avers the following:

- 1. Applicant House Springs Sewer Company, Inc., currently owes to the State of Missouri \$12,384.00 in operating permit fees required under the Missouri Clean Water Law, specifically 10 CSR 20-6.011, relating to six wastewater treatment systems it owns. True and accurate copies of invoices for these six systems are attached hereto as Appendix A.
- 2. Applicant House Springs Sewer Company, Inc., will owe to the State of Missouri \$5,800.00 in operating permit fees required under the Missouri Clean Water Law, specifically 10 CSR 20-6.011, as of April 1, 2016, relating to three wastewater treatment systems it owns. True and accurate copies of invoices for these three systems are attached hereto as Appendix B.
 - 3. To date, those permit fees described in Appendices A and B have not been paid.
- 4. The Department seeks to intervene in this proceeding for the limited purpose of seeking appropriate relief as necessary to ensure that permit fees owed by House Springs Sewer Company, Inc., are paid.
- 5. The Department does not oppose the relief sought in the Joint Application, except to the extent the Joint Applicants would rely on any such relief granted to avoid payment of the permit fees described herein.
- 6. The Department's intervention in this proceeding will not unduly delay or prejudice the rights and duties of the joint applicants or any other interested parties.

WHEREFORE, the Department respectfully requests an Order from the Missouri Public Service Commission, (1) granting the Department a limited intervention in this matter; (2) permitting the Department to file pleadings asserting its claims; and (3) for such other and further relief as is just and proper.

Respectfully submitted,

By:

Don Willoh, #44331

Assistant General Counsel

Missouri Department of Natural Resources

General Counsel's Office 1101 Riverside Drive

P.O. Box 176

Jefferson City, MO 65102-0176

P: 573-751-5464

F: 573-526-3444

E: don.willoh@dnr.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that on March ______, 2016, a copy of this Motion to Intervene was served via U.S. mail, first class, postage prepaid, upon the following parties:

Missouri Public Service Commission Department Staff Counsel 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

Office of the Public Counsel
Dustin Allison
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
staffcounselservice@psc.mo.gov

House Springs Sewer Company, Inc. Jennifer L. Hernandez 1802 Sun Valley Drive Jefferson City, MO 65109 jennifer@hernandezlegal.com

Jefferson County Public Sewer District Jennifer L. Hernandez 1802 Sun Valley Drive Jefferson City, MO 65109 jennifer@hernandezlegal.com Appendix A



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63052

Invoice #:

34601603091

Permit #;
Date:

MO0124788 02/08/2016

Date Due:

UPON RECEIPT

THIRD AND I	INAL NOTIC	CE		···
Description	Unit	Quantity	Amount	Total
HSSC, MILLER CROSSING WTF * FOR FEE DATE OF: 11/2015 CURRENT INVOICE # 34601603091	PERMIT	1.00	\$600.00	\$600.00
LATE PENALTIES: CURRENT INVOICE # 34601603091				\$24.00
STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN VATER LAW: 10 CSR 20-6.011.	Current Balance Due		t Balance Due	\$600.00
	Past Balance Due			\$0.00
	Less Payments Received		ents Received	\$0.00
	Plus Late Penalties		Late Penalties	\$24.00
	Total Due			\$624.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Permit #: MO0124788 Please return this remittance advice with your payment to: Invoice Number: HOUSE SPRINGS SEWER CO Missouri Department Of Natural Resources 34601603091 Invoice Date: 6509 NORTHWEST OFFICE CENTER Administrative Support / Accounting HOUSE SPRINGS, MO 63052 Po Box 477, Jefferson City, Mo 65102 02/08/2016 Fee Month/Year: 11 /2015 Make check payable to MO DEPT OF NATURAL RESOURCES **Total Due:** Check No: Amount Enclosed: \$624.00 Please include the Permit # on your check. Due Date: **UPON RECEIPT** Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: Visa ____ MC ___ Discover _ WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$600.00 /34601603091 Credit Card # Exp Date: / Signature: Accounting Distribution for Penalties:

WP PERMIT LATE PENALTIES 0568-780-4461-1618-= \$24,00/34601603091



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63051

Invoice #:

34601603102

Permit #:
Date:

MO0126926 02/08/2016

Date Due:

UPON RECEIPT

THIRD AND I	FINAL NOTIO	CE		
Description	Unit	Quantity	Amount	Total
HSSC, FISHER RD * FOR FEE DATE OF: 11/2015 CURRENT INVOICE # 34601603102	PERMIT	1.00	\$4,000.00	\$4,000.00
LATE PENALTIES: CURRENT INVOICE # 34601603102			The property section of the Control	\$160.00
STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN VATER LAW: 10 CSR 20-6.011.	Current Balance Due		t Balance Due	\$4,000.00
	Past Balance Due			\$0.00
	Less Payments Received		ents Received	\$0.00
	Plus Late Penalties		Late Penalties	\$160.00
		فوالله والمواشين وسيروس وسنوه مانية المناقب وسيوس والمواد	Total Due	\$4,160.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Permit #: MO0126926 Please return this remittance advice with your payment to: Invoice Number: HOUSE SPRINGS SEWER CO Missouri Department Of Natural Resources 34601603102 Invoice Date: 6509 NORTHWEST OFFICE CENTER Administrative Support / Accounting Po Box 477, Jefferson City, Mo 65102 HOUSE SPRINGS, MO 63051 02/08/2016 Make check payable to MO DEPT OF NATURAL RESOURCES Fee Month/Year: 11 /2015 **Total Due:** \$4,160.00 Amount Enclosed: Check No: Please include the Permit # on your check. Due Date: **UPON RECEIPT** Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: Visa ____ MC ___ Discover WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$4,000.00/34601603102 Credit Card # Exp Date: ____/ ____ Signature: Accounting Distribution for Penalties:

WP PERMIT LATE PENALTIES 0568-780-4461-1618-= \$160.00/34601603102



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO

6509 NORTHWEST OFFICE CENTER HOUSE SPRINGS, MO 63052-1168

Invoice #:

34601605239

Permit #: Date: MO0100374

Date Due:

12/10/2015 02/29/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
HSSC, HS Senior and Early Childhood Cen. * FOR FEE DATE OF: 2/2016 CURRENT INVOICE # 34601605239	PERMIT	1.00	\$1,000.00	\$1,000.00
STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN VATER LAW: 10 CSR 20-6.011.	Current Balance Due			\$1,000.00
	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
			Total Due	\$1,000.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Please return this remittance advice with your payment to: Permit #: MO0100374 Invoice Number: HOUSE SPRINGS SEWER CO Missouri Department Of Natural Resources 34601605239 Invoice Date: 6509 NORTHWEST OFFICE CENTER Administrative Support / Accounting HOUSE SPRINGS, MO 63052-1168 Po Box 477, Jefferson City, Mo 65102 12/10/2015 Fee Month/Year: 2 /2016 Make check payable to MO DEPT OF NATURAL RESOURCES Total Due: \$1,000.00 Amount Enclosed: Check No: Please include the Permit # on your check. Due Date: 02/29/2016 Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$1,000.00/34601605239 Credit Card# Exp Date: /

Signature:



MISSOURI DEPARTMENT OF NATURAL RESOURCES Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63051

Invoice #:

34601605255

Permit #: Date: MO0106909

Date Due:

12/10/2015 02/29/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
HSSC, Meadowbrook Estates * FOR FEE DATE OF: 2/2016 CURRENT INVOICE # 34601605255 *STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN WATER LAW: 10 CSR 20-6.011.	PERMIT	1.00	\$3,000.00	\$3,000.00
	Current Balance Due			\$3,000.00
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties		Late Penalties	\$0.00
			Total Due	\$3,000.00

	Please detach here and return lower portion	with your payment.	
Permit #: MO0106909 HOUSE SPRINGS SEWER CO 6509 NORTHWEST OFFICE CEN HOUSE SPRINGS, MO 63051	Please return this remittance advice w Missouri Department Of Natur ITER Administrative Support / A Po Box 477, Jefferson City,	ral Resources counting	Invoice Number: 34601605255 Invoice Date: 12/10/2015
ee Month/Year: 2 /2016	Make check payable to MO DEPT OF N	ATURAL RESOURCES	
Total Due: \$3,000.00 Due Date: 02/29/2016	Amount Enclosed:	Check No: Please include the	Permit # on your check.
ccounting Distribution: /P01 DOMESTIC ANNUAL>5000GPD 0568-78	the MO Dept of Natural Resolution of Natural Resolution of the MO Dept of Natural Resolution	sources.	e is paid to a 3rd party vendor, no



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO 4089 COUNTRY CLUB DRIVE IMPERIAL, MO 63052 Invoice #:

34601606209 MO0108642

Permit #: Date:

01/11/2016

Date Due:

03/31/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
Sycamore Springs MHP * FOR FEE DATE OF: 3 /2016 CURRENT INVOICE # 34601606209	PERMIT	1.00	\$3,000.00	\$3,000.00
STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN VATER LAW: 10 CSR 20-6.011.	Current Balance Due			\$3,000.00
	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
		والمراقب وال	Total Due	\$3,000.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Permit #: MO0108642 Please return this remittance advice with your payment to: Invoice Number: HOUSE SPRINGS SEWER CO Missouri Department Of Natural Resources 34601606209 **4089 COUNTRY CLUB DRIVE** Administrative Support / Accounting Invoice Date: IMPERIAL, MO 63052 Po Box 477, Jefferson City, Mo 65102 01/11/2016 Fee Month/Year: 3 /2016 Make check payable to MO DEPT OF NATURAL RESOURCES **Total Due:** Amount Enclosed: _____ Check No: \$3,000.00 Due Date: Please include the Permit # on your check. 03/31/2016 Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: Visa ____ MC_ Discover WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$3,000,00/34601606209 Credit Card # Exp Date: ____/ _____

Signature:



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63051

Invoice #:

34601606212

Permit #:
Date:

MO0109304

Date Due:

01/11/2016 03/31/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
HSSC, Cedar Springs Elementary School * FOR FEE DATE OF: 3/2016 CURRENT INVOICE # 34601606212 *STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN WATER LAW: 10 CSR 20-6.011.	PERMIT	1.00	\$600.00	\$600.00
	Current Balance Due			\$600.00
	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
			Total Due	\$600.00

Please note that your annual fee may l	ave changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment.
Permit #: MO0109304 HOUSE SPRINGS SEWER CO 6509 NORTHWEST OFFICE CENT HOUSE SPRINGS, MO 63051	Please return this remittance advice with your payment to: Missouri Department Of Natural Resources Administrative Support / Accounting Po Box 477, Jefferson City, Mo 65102 Invoice Number: 34601606212 Invoice Date: 01/11/2016
Fee Month/Year: 3 /2016 Total Due: \$600.00 Due Date: 03/31/2016	Make check payable to MO DEPT OF NATURAL RESOURCES Amount Enclosed: Check No: Please include the Permit # on your check.
Per Chapter 37, Section 37.007 RSMo, if Accounting Distribution: WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4 /34601606212	aying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Visa MC Discover Credit Card # Exp Date: / Signature:

Appendix B



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER COMPANY

6509 NORTHWEST OFFICE CENTER HOUSE SPRINGS, MO 630521

Invoice #:

34601607908 MO0103233

Permit #: Date:

02/08/2016

Date Due:

04/30/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
HSSC, Bear Creek Estates * FOR FEE DATE OF: 4/2016 CURRENT INVOICE # 34601607908 *STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN WATER LAW: 10 CSR 20-6.011.	PERMIT	1.00	\$3,000.00	\$3,000.00
	Current Balance Due			\$3,000.00
THE CONTRACTOR OF THE CONTRACT	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
			Total Due	\$3,000.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Permit #: MO0103233 Please return this remittance advice with your payment to: Invoice Number: Missouri Department Of Natural Resources 34601607908 HOUSE SPRINGS SEWER COMPANY Invoice Date: 6509 NORTHWEST OFFICE CENTER Administrative Support / Accounting HOUSE SPRINGS, MO 630521 Po Box 477, Jefferson City, Mo 65102 02/08/2016 Fee Month/Year: 4 /2016 Make check payable to MO DEPT OF NATURAL RESOURCES **Total Due:** \$3,000.00 Amount Enclosed: Check No: Due Date: Please include the Permit # on your check. 04/30/2016 Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$3,000,00/34601607908 Credit Card# Exp Date: / Signature:



MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER COMPANY

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63051

Invoice #:

34601608111

Permit #:
Date:

MO0136468 02/08/2016

Date Due:

04/30/2016

ANNUA	L NOTICE			
Description	Unit	Quantity	Amount	Total
HSSC, Otto Express Mart * FOR FEE DATE OF: 4/2016 CURRENT INVOICE # 34601608111 *STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN WATER LAW: 10 CSR 20-6.011.	PERMIT	1.00	\$1,800.00	\$1,800.00
	Current Balance Due			\$1,800.00
	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
			Total Due	\$1,800.00

Please note that your annual fee may hav	e changed based on revisions to 10 CSR 20-6.011 which is effective	e January 1, 2015 pursuant to RSMo 644.054.
· · · · · · · · · · · · · · · · · · ·	Please detach here and return lower portion with your payment.	
Permit #: MO0136468 HOUSE SPRINGS SEWER COMPAN 6509 NORTHWEST OFFICE CENTEL HOUSE SPRINGS, MO 63051	The state of the s	: Invoice Number: 34601608111 Invoice Date: 02/08/2016
Fee Month/Year: 4 /2016 M. Total Due: \$1,800.00 Due Date: 04/30/2016		CES Check No: include the Permit # on your check.
Per Chapter 37, Section 37.007 RSMo, if pay Accounting Distribution: WP 12 UI SITE SPECIFIC PERMITS 0568-780-4461-11: 34601608111	ving by electronic method, a transaction fee will be included. The tr the MO Dept of Natural Resources. Visa MC Discover Credit Card # Exp Date:/	ansaction fee is paid to a 3rd party vendor, not



MISSOURI DEPARTMENT OF NATURAL RESOURCES Division Of Environmental Quality / Water Protection Program

Jefferson City, MO 65102

Contact:

BUDGET & FEES UNIT

Phone:

573-751-1300

Fax:

573-526-1146

Bill To: HOUSE SPRINGS SEWER CO,IN

6509 NORTHWEST OFFICE CENTER

HOUSE SPRINGS, MO 63051

Invoice #:
Permit #:

34601607904 MO0100668

Date:

02/08/2016

Date Due: 04/30/2016

ANNUAL NOTICE				
Description	Unit	Quantity	Amount	Total
HSSC, Echo Valley Estates * FOR FEE DATE OF: 4/2016 CURRENT INVOICE # 34601607904 *STATE OPERATING PERMIT UNDER THE MISSOURI CLEAN VATER LAW: 10 CSR 20-6.011.	PERMIT	1.00	\$1,000.00	\$1,000.00
	Current Balance Due			\$1,000.00
	Past Balance Due			\$0.00
	Less Payments Received			\$0.00
	Plus Late Penalties			\$0.00
	Total Due			\$1,000.00

Please note that your annual fee may have changed based on revisions to 10 CSR 20-6.011 which is effective January 1, 2015 pursuant to RSMo 644.054. Please detach here and return lower portion with your payment. Permit #: MO0100668 Please return this remittance advice with your payment to: Invoice Number: HOUSE SPRINGS SEWER CO,IN Missouri Department Of Natural Resources 34601607904 6509 NORTHWEST OFFICE CENTER Administrative Support / Accounting Invoice Date: HOUSE SPRINGS, MO 63051 Po Box 477, Jefferson City, Mo 65102 02/08/2016 Fee Month/Year: 4 /2016 Make check payable to MO DEPT OF NATURAL RESOURCES **Total Due:** \$1,000.00 Amount Enclosed: Check No: Due Date: Please include the Permit # on your check. 04/30/2016 Per Chapter 37, Section 37.007 RSMo, if paying by electronic method, a transaction fee will be included. The transaction fee is paid to a 3rd party vendor, not the MO Dept of Natural Resources. Accounting Distribution: Visa MC WP 01 DOMESTIC ANNUAL>5000GPD 0568-780-4461-1130-01= \$1,000,00/34601607904 Credit Card# Exp Date: ____/ _____ Signature: