

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

In the Matter of Public Counsel's Petition	)	
To Open a Workshop Docket to Investigate	)	Case No. WO-2009-0362
Solutions to Issues Faced by Small	)	
Water and Sewer Regulated Public Utilities	)	

**STATEMENT IN SUPPORT OF PUBLIC COUNSEL'S  
PETITION TO OPEN A WORKSHOP DOCKET**

COMES NOW the Missouri Attorney General's Office, through Assistant Attorneys General Jack McManus and Jessica L. Blome, and for its *Statement in Support of Public Counsel's Petition to Open a Workshop Docket to Investigate Solutions to Issues Faced by Small Water and Sewer Regulated Public Utilities*, states as follows:

1. Chris Koster is the duly elected, qualified and acting Attorney General of the State of Missouri. The Attorney General is authorized to protect the rights and interests of the State under § 27.060, RSMo

2. On April 9, 2009, Public Counsel filed its *Petition to Open a Workshop Docket to Investigate Solutions to Issues Faced by Small Water and Sewer Regulated Public Utilities* (hereinafter *Petition to Open Workshop Docket*).

3. Section 393.145.1, RSMo provides that "[e]very gas corporation, every electrical corporation, every water corporation, and every sewer corporation shall furnish and provide such service instrumentalities and facilities as shall be *safe and adequate* and in all respects just and reasonable" (emphasis added).

4. The Attorney General supports Public Counsel's *Petition to Open a Workshop Docket* for the reasons stated therein and because the Attorney General receives requests for enforcement action against regulated small sewer and water utilities that sometimes prove financially incapable of bringing their sewer and water systems into compliance with the

Missouri Clean Water and Safe Drinking Water Laws, resulting in the utilities' failure to provide safe and adequate service to their customers.

Respectfully submitted,

CHRIS KOSTER  
Attorney General

/s/John K. McManus

JOHN K. MCMANUS, Chief Counsel  
Agriculture and Environment Division  
Missouri Bar No. 59486  
P.O. Box 899  
Jefferson City, MO 65102-0899  
Phone: (573) 751-8370  
Fax: (573) 751-8796  
E-mail: jack.mcmanus@ago.mo.gov

/s/ Jessica L. Blome

JESSICA L. BLOME  
MBE # 59710  
Assistant Attorney General  
P.O. Box 899  
Jefferson City, Missouri 65102  
Bar No. 59710  
573-751-8795  
573-751-8464 (fax)  
jessica.blome@ago.mo.gov

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 20th day of April, 2009.

/s/ Jessica L. Blome

JESSICA L. BLOME