

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

In the Matter of the Application of Indian Hills            )  
Utility Operating Company, Inc., to Acquire            )  
Certain Water Assets of I.H. Utilities, Inc. and        )        File No. WO-2016-0045  
in Connection Therewith, Issue Indebtedness        )  
and Encumber Assets    )

**RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW** Indian Hills Utility Operating Company, Inc. (Indian Hills UOC or Applicant) and, in response to the Order Regarding Confidential Information and Directing Filing, states as follows to the Missouri Public Service Commission (Commission):

1.       On January 27, 2016, the Commission issued its Order Regarding Confidential Information and Directing Filing (Order Directing Filing). Therein, the Commission accurately stated that “Applicant is owned by a holding company, which is owned by an LLC, which is managed by a separate corporation.” The names of these entities had previously been identified as Highly Confidential. The Commission further directed Indian Hills “to file a response to this order citing law and alleging fact supporting the highly confidential classifications.”

2.       As Indian Hills UOC’s parent entities have attempted to establish their business in the State of Missouri through negotiations with various entities, they have seen the corporate structure to be both “market-specific information related to services offered in competition with others” and a part of their “strategies employed, to be employed, or under consideration in contract negotiations.” (Commission Rule 4 CSR 240-2.135) Indian Hills UOC appreciates the Staff’s treatment of this information as confidential consistent with the provisions of Section 386.480, RSMo.

3. With the transaction that is the subject of this file, the parent entities will have completed the acquisition of five sewer and water systems in Missouri. New construction on water and sewer facilities has been completed at four of those systems. Construction is underway at one other system. These projects include over \$3 million of investment. The parent entities are further in contract negotiations with many other systems in the state of Missouri.

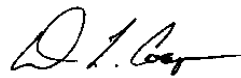
4. Given the more mature stage of this operation, the names of the corporate entities cited by the Order Directing Filing no longer need to be maintained as Highly Confidential.

Accordingly, it is hereby confirmed that:

Indian Hills Utility Operating Company, Inc. is wholly owned by Indian Hills Utility Holding Company, Inc., which is wholly owned by First Round CSWR, LLC, which is managed by Central States Water Resources, Inc.

**WHEREFORE**, requests that the Commission consider this response to satisfy its Order Regarding Confidential Information and Directing Filing and, thereafter, grant the Application herein.

Respectfully submitted,



Dean L. Cooper, MBE #36592

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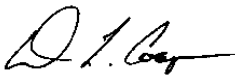
**ATTORNEYS FOR INDIAN HILLS UTILITY  
OPERATING COMPANY, INC.**

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on January 29, 2016, to the following:

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