

**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 RESPONSE  
TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES’  
APPLICATION TO INTERVENE**

**COMES NOW** Ridge Creek Water Company, LLC (hereinafter “Company” or “Applicant”) and for its response to the Application to Intervene filed by the Missouri Department of Natural Resources submits the following to the Missouri Public Service Commission (“Commission”):

1. On February 24, 2015, the Missouri Department of Natural Resources (“DNR”) filed its Application to Intervene in this matter.

2. In paragraph 4 of its Application to Intervene, DNR asserts:

[Applicant] installed an unpermitted public water system that may not be in compliance with Missouri law and safe drinking water regulations. The Department has been working with [Applicant] to bring it into compliance, but as of the date of this filing, [Applicant] remains out of compliance. The people served by the system may therefore be without safe water to drink.

3. The Company did not install and is not the owner of the system to which DNR refers in paragraph 4. That water system is currently owned and operated by Ridge Creek Development LLC (“Ridge Creek Development”), the respondent in Case No. WC-2015-0011.

4. Based upon counsel’s information and belief, Ridge Creek Development strongly

disagrees and disputes that: a) the water system it owns was installed contrary to the provisions of the Missouri Safe Drinking Water Act (“SDWA”) or DNR requirements; and b) the water system’s operations are out of compliance with DNR regulations or applicable law. Ridge Creek Development and DNR are actively negotiating toward resolution of their respective differences concerning the history of the water system’s installation and its ongoing operation.

5. The Company contends that the Ridge Creek Development water system provides safe and adequate service to those currently receiving service, and the Company intends to acquire that system contingent upon Commission approval of the certificate applied for in this matter. Thereafter, the Company will continue to provide safe and adequate service to those customers.

6. The Company has no objection to DNR’s application to intervene in this matter except to the extent set forth in the foregoing.

Respectfully submitted

/s/ Mark W. Comley

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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 6<sup>th</sup> day of March, 2015, to Thais Ann Folta at [thais.folta@ago.mo.gov](mailto:thais.folta@ago.mo.gov); General Counsel’s Office at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov).

/s/ Mark W. Comley