

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

In the Matter of Missouri-American Water	)	
Company for Certificates of Convenience and	)	
Necessity Authorizing it to Install, Own, Acquire	)	Case No. SA-2019-0183
Construct, Operate Control, Manage and	)	
Maintain a Sewer System in an Area of Clinton	)	
County, Missouri (Timber Springs Estates)	)	

**THE OFFICE OF THE PUBLIC COUNSEL’S RESPONSE  
TO STAFF’S FEBRUARY 11 RECOMMENDATION**

**COMES NOW** the Office of the Public Counsel (Public Counsel) and in Response to the Commission Staff’s (Staff) Recommendation states:

1. Public Counsel has reviewed the filing and generally supports Missouri American Water Company’s (MAWC) request for a Certificate of Convenience and Necessity (CCN) to serve an area in Clinton County currently managed by a non-regulated homeowners association.

2. Public Counsel’s concern, however, is that MAWC “requests an approved service area that extends well beyond the Timber Springs subdivision.” (Staff Memo at p. 2) The area includes two other existing sewage treatment facilities . . . one of which MAWC may purchase in the future.” *Id.*

3. Public Counsel is in the process of seeking additional information from MAWC to address whether the other homeowners associations are aware of MAWC’s request to extend its service territory into their areas.

4. As soon as Public Counsel has discussed this situation with MAWC, it will promptly file its comments concerning the Staff Recommendation.

5. Public Counsel states that no party should be prejudiced or otherwise inconvenienced by a short delay in making its response.

WHEREFORE Public counsel asks the Commission accept this filing as the required 10-day response to Staff's memorandum, with the understanding Public Counsel will further respond as soon as possible.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY: /s/ Lera L. Shemwell

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 21<sup>th</sup> day of February, 2019.

/s/ Lera Shemwell