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

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In the Matter of Mid Mo Sanitation LLC for a Certificate of Convenience and Necessity (Line Certificate) Authorizing it to Own, Operate, Maintain, Control and Manage a Sewer System in Callaway County, Missouri

File No. SA-2022-0029

## **REQUEST REGARDING APPLICATION FOR CCN**

**COMES NOW** Mid Mo Sanitation, LLC ("Mid Mo"), by and through the undersigned counsel, and requests the Commission consider this matter and issue an order regarding its *Application* and *Motion for Waiver*. In support of its request, Mid Mo states as follows to the Missouri Public Service Commission ("Commission"):

1. On August 4, 2021, Mid Mo Sanitation, LLC (Mid Mo) filed an *Application and Motion for Waiver* (*"Application"*) requesting a certificate of convenience and necessity ("CCN") to own, operate, maintain, control, and manage a sewer system in Callaway County, Missouri.

2. On September 10, 2021, Staff filed its recommendation for the Commission to grant Mid Mo's *Application* for a CCN. No responses to Staff's recommendation were received.

3. The area for which Mid Mo seeks a CCN is critical to the operation of its permitted sewer system in compliance with the Missouri Clean Water Law and Missouri Department of Natural Resources regulations.

4. Further, Mid Mo has a pending rate case before the Commission in File No. SR-2021-0372. The procedural posture of the rate case is such that a Commission decision and order regarding the *Application* will assist reaching a resolution in the rate case.

**WHEREFORE**, Mid Mo respectfully requests the Commission consider this matter and issue an order regarding the *Application and Motion for Waiver*.

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Respectfully submitted,

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## ATTORNEYS FOR MID MO SANITATION, LLC

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record this 24<sup>th</sup> day of September 2021.

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