

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

In the Matter of the Application of Confluence)
Rivers Utility Operating Company, Inc., for a)
Certificate of Convenience and Necessity and)
to Acquire Certain Sewer Assets)
File No. SA-2022-0299

RESPONSE TO STAFF RECOMMENDATION

COMES NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), and for its *Response to Staff Recommendation* states as follows to the Missouri Public Service Commission (“Commission”):

1. On April 28, 2022, Confluence Rivers filed an *Application and Motion for Waiver* (“*Application*”) requesting permission, approval, and a certificate of convenience and necessity (“CCN”) to install, own, acquire, construct, operate, control, manage, and maintain the currently unregulated sewer system of Deer Run Estates Property Owners Association, in Madison County, Missouri.

2. On April 29, 2022, the Commission issued its *Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to File a Recommendation* that directed Staff to file its recommendation or a status report regarding the *Application* no later than June 15, 2022. On June 13, 2022, Staff filed a *Request for Extension of Time* and the Commission granted Staff’s request and ordered Staff to file its recommendation no later than August 15, 2022. On August 11, 2022, Staff filed a *Request for Second Extension of Time* and the Commission granted Staff’s request and ordered Staff to file its recommendation no later than August 29, 2022.

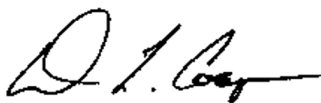
3. On August 29, 2022, Staff filed its *Staff Recommendation* and supporting *Memorandum* finding that the issuance of a CCN to Confluence Rivers is necessary or convenient

for the public service, and recommended the Commission grant Confluence Rivers' *Application*, authorize Confluence Rivers to acquire the unregulated Deer Run Estates Property Owners Association sewer system assets, and grant Confluence Rivers a CCN to operate the sewer system assets subject to the conditions described in Staff's *Memorandum*.

4. Confluence Rivers has reviewed the proposed conditions listed on pages 10-11 of Staff's *Memorandum* and states that it has no objection to the proposed conditions.

WHEREFORE, Confluence Rivers requests the Commission issue an order approving Confluence Rivers' *Application* and granting Confluence Rivers a CCN as recommended in Staff's *Memorandum*, and for such other and further relief as deemed appropriate in the circumstances.

Respectfully submitted,



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**ATTORNEYS FOR CONFLUENCE RIVERS
UTILITY OPERATING COMPANY, INC.**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 8th day of September 2022 to all counsel of record.

