

LCSW

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FILED

MAR 13 2018

Missouri Public
Service Commission

MARCH 9, 2018

RE: FILE NO. AW-2018-0237

1. WE ARE A LIMITED LIABILITY COMPANY
2. WE DO NOT COLLECT TAX EXPENSE IN OUR RATES. YOU WOULD THINK THAT THE COMPANY WOULD BE ABLE TO BE COMPENSATED FOR THE INCOME TAX OR ANY OTHER TAX EXPENSE SUCH AS THE PAYROLL TAX. THE PUBLIC SERVICE COMMISSION WOULD NOT ALLOW US COMPENSATION. OUR RATE CASE WAS WROUGHT WITH CONTENTION AND SEEMINGLY PURPOSEFUL INTENT OF LIMITING OUR CAPABILITY OF RECOUPING OUR INVESTMENT AND EXPENSES.
3. AS OF LAST WEEK THE NEW RULES WERE NOT PUBLISHED. CONGRESS HAS UNTIL DECEMBER 31, 2018 TO MAKE CHANGES TO THE NEW LAW BEFORE IT IS IMPLEMENTED. WE HAD TO MAKE AN APPOINTMENT WITH OUR TAX ACCOUNTANT TO FIND THIS INFORMATION, WHICH WAS A WASTE OF OUR TIME AND MONEY. IT WOULD SEEM THAT THE STAFF SHOULD HAVE WAITED UNTIL AFTER DECEMBER 31, 2018 TO REQUEST ANY REAL INPUT. ANYTHING AT THIS TIME WOULD BE PURELY SPECULATION. THIS JUST APPEARS TO BE A WASTE OF TIME AND NOT SURE HOW IT WILL BE BENEFICIAL UNLESS THE STAFF IS SEARCHING FOR SOME OPINIONS WHICH JUST PUTS A BURDEN ON COMPANIES AT A BUSY TIME OF YEAR. THE PUBLIC SERVICE COMMISSION WANTS A RESPONSE WITH 2 WEEKS FOR THIS TYPE OF THING BUT THEY TAKE OVER A YEAR FOR A SIMPLE RATE CASE.
4. WE WOULD LIKE TO HAVE A CHANGE IN RATES WHEN WE HAVE A SIGNIFICANT EXPENSE SUCH AS A PUMP AND MOTOR GOING OUT, WHICH HAS HAPPENED TO US THREE TIMES SINCE OUR LAST RATE CASE AND HAS COST WELL OVER \$30,000. 00. WE HAD TO BORROW THE MONEY.
AFTER THE WAY THAT WE WERE TREATED IN OUR RATE CASE, WE WILL NEVER VOLUNTARILY COME IN AGAIN. THE PUBLIC SERVICE COMMISSION HAS PUT A TRACKER ON US, THEREFORE WE FEEL AS IF IT IS LEFT UP TO THE PSC.
IF YOU HAVE ANY QUESTIONS, PLEASE FEEL FREE TO CALL US.

RESPECTFULLY,



DENNIS KALLASH
LCSW

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service
Commission held at its office in
Jefferson City on the 7th day of
March, 2018.

In the Matter of the Revenue Effects Upon
Small Water and Sewer Utilities of the
Tax Cuts and Jobs Act of 2017

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File No. AW-2018-0237

**ORDER OPENING A WORKING PROCEEDING REGARDING THE EFFECTS UPON
MISSOURI SMALL WATER AND SEWER UTILITIES OF THE TAX CUTS OF 2017
AND DIRECTING RESPONSE**

Issue Date: March 7, 2018

Effective Date: March 7, 2018

On March 1, 2018, the Staff of the Commission filed a motion asking the Commission to open a proceeding to investigate the effect the recent federal tax cut legislation will have on the revenues of Missouri's small water and sewer utilities. As part of that motion, Staff asks the Commission to direct those small utilities to respond in fifteen days to the following questions:

- 1) For purposes of payment of income tax, is your company:
 - (a) A C Corporation;
 - (b) A Subchapter S Corporation;
 - (c) A Limited Liability Corporation;
 - (d) A Partnership; or
 - (e) Other?
- 2) If you know, does your company currently collect income tax expense in customer rates? If so, how much?

- 3) Have you or your financial advisors or consultants performed any analysis of the likely impact of the Tax Cuts and Jobs Act of 2017 on your cost of service and customer rates? If so, please provide such analysis.
- 4) Generally speaking, when do you expect your company to seek a change in customer rates from the Commission?

The Commission will direct the small utilities to respond to Staff's questions. Anyone else wishing to respond to address these matters is invited to do so.

This file will serve as a repository for documents and comments. Using this file, any person with an interest in this matter may view documents and may submit comments or documents. As this is not a contested case, anyone may file a comment without legal counsel. Intervention requests are not necessary to submit comments or view documents.

The public is welcome to submit comments through the Commission's electronic filing and information system (EFIS) at the Commission's website, <http://www.psc.mo.gov>. (Click on the Submit Comments link on the right side of the page. Please refer to File No. AW-2018-0237). Written comments in hard copy may be mailed to the Commission at P.O. Box 360, Jefferson City, Missouri 65102 and should also reference File No. AW-2018-0237.

THE COMMISSION ORDERS THAT:

1. The Commission's Data Center shall provide a copy of this order to all Missouri water corporations and sewer corporations, excluding Missouri-American