

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)	
Algonquin Water Resources of Missouri, LLC,)	
d/b/a Liberty Water for Authority for Liberty)	
Water to Acquire Certain Assets of Noel Water)	<u>Case No. WO-2011-0328</u>
Co., Inc. and, in Connection Therewith,)	
Certain Other Related Transactions.)	

STAFF'S REQUEST FOR LOCAL PUBLIC HEARING

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and files this *Request for Local Public Hearing (Request)* with the Missouri Public Service Commission (Commission), respectfully stating the following:

1. On April, 6, 2011, a *Joint Application of Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water for Authority for Liberty Water to Acquire Certain Assets of Noel Water Co., Inc. and, in Connection Therewith, Certain Other Related Transactions (Joint Application)* was filed with the Commission.

2. On April 13, 2011, the Commission issued an Order providing that any application to intervene should be filed no later than May 3, 2011. No such application was filed with the Commission.

3. On April, 27, 2011, Staff received a letter from the Mayor of Noel. In the letter, the Mayor raised concerns regarding the proposed transfer of assets.

4. On May 24, 2011, Staff filed a *Motion for Extension of Time*, until July 25, 2011, to file its Recommendation with the Commission.

5. Also on May 24, 2011, Staff met with representatives of the City of Noel, Missouri and representatives of Liberty Water to discuss this *Joint Application* as well as concerns raised in the Mayor's letter. During this meeting, there was a discussion regarding

whether a local public hearing would be beneficial in this matter and it was decided it would be helpful.

6. While not typical in these cases, Staff recommends and requests that the Commission schedule a local public hearing so that the citizens of Noel, Missouri would have an opportunity to hear about this potential transfer of assets from the Parties and Staff and voice any additional concerns they may have.

7. Staff further requests that a local public hearing be scheduled at the earliest possible date, preferably before June 30, 2011, so that Staff is able to address any new concerns prior to filing its recommendation by July 25, 2011.

8. This *Request* is not filed for the purposes of delay.

WHEREFORE, Staff respectfully submits this *Request* to the Commission for its information and consideration, and respectfully requests that the Commission schedule a local public hearing in the near future.

Respectfully submitted,

/s/ RACHEL M. LEWIS

Rachel M. Lewis

Deputy Counsel

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 27th day of May, 2011.

/S/ RACHEL M. LEWIS