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

In the Matter of the Application of	)	
TUK, LLC to Sell Its Sewer Assets to	)	File No. SM-2022-0131
Seven Springs Sewer & Water, LLC	)	

## RESPONSE TO STAFF RECOMMENDATION

**COME NOW**, TUK, LLC ("TUK") and Seven Springs Sewer & Water LLC ("Seven Springs"), by and through the undersigned counsel, and, as their *Response to Staff Recommendation*, states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On March 16, 2022, Staff filed its *Staff Recommendation* and supporting *Staff Memorandum* recommending that the Commission: authorize TUK and Seven Springs to enter into, execute, and perform in accordance with the terms described in the *Contract for Purchase and Sale*, attached as Appendix C to the *Application and Motion for Waiver*; cancel TUK's certificate of convenience and necessity ("CCN") and tariff; and grant Seven Springs a CCN to provide sewer service in the territory currently served by TUK, with the conditions described in the *Staff Memorandum*.
- 2. As part of the Commission's December 27, 2021 Order directing Staff to file a recommendation, the Commission also ordered parties to file any responses to Staff's recommendation no later than March 28, 2022.
- 3. TUK and Seven Springs hereby state that they do not object to the 13 conditions listed on pages eight (8) and nine (9) of *Staff's Memorandum*.

WHEREFORE, TUK and Seven Springs provide this *Response to Staff Recommendation* and request the Commission authorize TUK and Seven Springs to enter into, execute, and perform in accordance with the terms described in the *Contract for Purchase and Sale*, attached as Appendix C to the *Application and Motion for Waiver*; cancel TUK's certificate of convenience

and necessity ("CCN") and tariff; grant Seven Springs a CCN to provide sewer service in the territory currently served by TUK, with the conditions in the *Staff Memorandum* as described herein; and grant the requested waiver from the 60 day requirement of 20 CSR 4240-4.017(1).

Respectfully submitted,

Dean L. Cooper, MBE #36592

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ATTORNEYS FOR TUK, LLC AND SEVEN SPRINGS SEWER & WATER LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was electronically transmitted on this 22<sup>nd</sup> day of March 2022 to all counsel of record.