

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

In the Matter of Missouri-American Water)
Company’s Application for a Certificate of)
Convenience and Necessity Authorizing it to)
Install, Own, Acquire, Construct, Operate,) **File No. WA-2022-0229**
Control, Manage and Maintain a Water)
System and Sewer System in an area of Pettis)
County, Missouri (Monsees Lake Estates)
Subdivision))

RESPONSE TO STAFF RECOMMENDATION

COMES NOW Missouri-American Water Company (“MAWC”), and for its *Response to Staff Recommendation* states as follows to the Missouri Public Service Commission (“Commission”):

1. On February 25, 2022, MAWC filed an *Application and Motion for Waiver*¹ (“*Application*”) requesting permission and approval for a certificate of convenience and necessity (“CCN”) to install, own, acquire, construct, operate, control, manage, and maintain a water system and sewer system in Pettis County, Missouri in a subdivision known as Monsees Lake Estates Subdivision. The cases were assigned File Nos. WA-2022-0229 and SA-2022-0230.²

2. On March 1, 2022, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation* (“*Order*”).³ The *Order* directed Staff to file its recommendation no later than April 25, 2022. On April 25, 2022, Staff filed a motion requesting until June 9, 2022, to file its recommendation. The

¹ On March 25, 2022, MAWC filed a *Motion for Leave to Amend Application and Amendment to the Application* (“*Motion*”). The *Motion* sought to amend the legal description and map provided with the *Application*. The Commission granted the *Motion* on April 8, 2022.

² The Commission consolidated the cases on March 14, 2022, with WA-2022-0229 being the lead case.

³ The Commission’s *Order* was corrected *nunc pro tunc* on March 4, 2022.

Commission granted the extension by order on May 16, 2022.

3. On June 9, 2022, Staff filed its recommendation for the Commission to grant MAWC a CCN with the conditions described in Staff's *Memorandum*, as granting the requested CCN is necessary and convenient for the public service.

4. MAWC has reviewed the proposed recommendations and conditions listed on pages 18 through 20 of Staff's *Memorandum* and states that it has no objection to the proposed recommendations and conditions.

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

Respectfully submitted,

/s/ Jennifer L. Hernandez

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**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 21st day of June 2022, to all counsel of record.

/s/ Jennifer L. Hernandez