

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

In the Matter of Mid Mo Sanitation)
LLC for a Certificate of Convenience)
and Necessity (Line Certificate))
Authorizing it to Own, Operate,) **Case No. SA-2022-0029**
Maintain, Control and Manage a)
Sewer System in Callaway County,)
Missouri)

**STAFF CONCURRENCE REGARDING
APPLICANT’S REQUEST REGARDING APPLICATION FOR CCN**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through undersigned counsel, and states the following in concurrence with the request of Mid Mo Sanitation, LLC (Mid Mo) filed on Friday, September 24, 2021:

1. In its request, Mid Mo notes that the procedural posture in its rate case SR-2021-0372, “is such that a Commission decision and order regarding the *Application* will assist reaching a resolution in that rate case.”

2. Staff filed its recommendation to grant a CCN on September 10, and no party has filed a timely response.¹

3. Mid Mo’s Application for a CCN is consequently unopposed, and the Commission has before it two analyses, one each from Mid Mo and from Staff, under which a CCN can be lawfully granted.

4. In Case Number SR-2021-0372, which was filed pursuant to the Commission’s Rule 20 CSR 4240-10.075, the next timeline event is due October 20, 2021, with Staff filing an executed disposition agreement and the utility filing

¹ See 20 CSR 4240-2.090(13) (“Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.”).

any necessary tariff revisions with a 45-day effective date.² Under Rule 10-075(11), the disposition can be unanimous or not, and it can resolve the full rate case or only a portion. If the case is not fully resolved by a unanimous disposition agreement, statements of position would be due on October 27, with Staff's recommendation due November 4.³ If an evidentiary hearing is requested, a procedural schedule would be filed for the case beyond day 150 that would supersede this timeline.⁴

5. An order granting Mid Mo's application for a CCN in this Case Number SA-2021-0029, would resolve all pending legal issues involving Mid Mo and the Commission and would therefore expedite the preparation of a unanimous disposition agreement in Mid Mo's rate case, Case Number SR-2021-0372, by removing any uncertainty as to the status of its CCN application.

6. For this reason, Staff concurs with Mid Mo's respectful request to consider this matter as expeditiously as possible, and to issue an order approving Mid Mo's *Application and Motion for Waiver*.

WHEREFORE, Staff respectfully concurs in Mid Mo's request to consider this matter and issue an order regarding Mid Mo's *Application and Motion for Waiver*, and for such other and further relief the Commission finds just and reasonable.

² *Notice of Extension* at pdf pages 5-6, Case No. SR-2021-0372, EFIS No. 6 (Jul. 22, 2021).

³ Rule 20 CSR 4240-10.075(11); *Notice of Extension* at pdf page 6.

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Respectfully submitted,

/s/ Curt Stokes

Curt Stokes

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**Counsel for Staff of the Missouri
Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28th day of September, 2021, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes