

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

In the Matter of Missouri-American )  
Water Company for a Certificate of )  
Convenience and Necessity Authorizing )  
it to Install, Own, Acquire, Construct, )  
Operate, Control, Manage and Maintain )  
a Sewer System in and around the City )  
of Hallsville, Missouri. )

**File No. SA-2021-0017**

**MISSOURI-AMERICAN’S RESPONSE TO STAFF’S RECOMMENDATION**

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

1. On November 18, 2020, Staff filed its *Staff Recommendation to Grant Certificate of Convenience and Necessity*. Staff’s Memorandum recommended the Commission grant Missouri-American a Certificate of Convenience and Necessity (CCN) to provide sewer service in and around the City of Hallsville, Missouri, with the eighteen (18) specific conditions listed on pages 14-15 of Staff’s Memorandum.

2. On November 23, 2020, the Commission issued its *Order Setting Deadline For Response To Staff’s Recommendation*, directing any response to Staff’s Recommendation be filed no later than December 4, 2020.

3. Missouri-American hereby states that it does not object to the eighteen (18) specific conditions listed on pages 14-15 of Staff’s Memorandum for approval of a CCN to provide sewer service in and around the City of Hallsville, Missouri.

4. While not objecting, Missouri-American wishes to provide the following additional response regarding conditions 2 and 5.

5. Staff's Memorandum at page 4 states "Upon acquisition of this system, the City plans to share all customer water usage with MAWC, in order for MAWC to provide service to current City customers at the existing City rates." This discussion by Staff relates to its recommended Condition 2, "Approve MAWC's adoption of existing sewer rates for the City[.]"

All homes and businesses connected to the City of Hallsville's sewer system are currently metered for water service. The City of Hallsville purchases water from the Public Water Supply District No. 4 ("PWSD#4") and provides water service for many of the homes and businesses. PWSD#4 provides water service directly to Douglas Pointe, Townsquare, and Echo Ridge subdivisions. For purposes of billing sewer service, usage is based on the customer's average water usage for the months January to March. PWSD#4 provides its water meter readings in order for the water usage to be averaged for customers in Douglas Pointe, Townsquare, and Echo Ridge subdivisions. Missouri-American will have to obtain from PWSD#4 its meter readings in order to average the water usage and bill the customers in Douglas Pointe, Townsquare, and Echo Ridge subdivisions for sewer service. Provision for the possibility of flat rate billing may need to be made in the resulting tariff to address any situation where Missouri-American is unable to obtain the referenced meter reads.

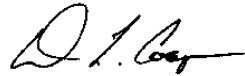
6. Staff's Memorandum at page 11 discusses the continuation of sewer service for all existing Boone County Regional Sewer District ("BCRSD") customers currently served by the City of Hallsville's sewer system. This discussion by Staff relates to its recommended Condition 5. Missouri-American is happy to enter into negotiations with BCRSD to form new agreements for the treatment of effluent from the Sunnyslope and Silver Creek Subdivisions. It is Missouri-American's understanding that Sunnyslope Subdivision has yet to be connected to the City of Hallsville's sewer system. To date, there are no existing BCRSD customers in the

Sunnyslope Subdivision. The Silver Creek Subdivision consists of 7 lots, with only one lot currently developed and connected to the City of Hallsville's sewer system today.

In summary, there is only one existing BCRSD customer currently served by the City of Hallsville's sewer system that would need to be addressed in order to "ensure continued service."

**WHEREFORE**, Missouri-American submits this Response and states that it does not object to the eighteen (18) specific conditions listed on pages 14-15 of Staff's Memorandum for approval of a CCN to provide sewer service in and around the City of Hallsville, Missouri.

Respectfully submitted,



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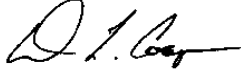
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**ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent to all counsel of record by electronic mail this 4<sup>th</sup> day of December 2020.

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