BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of The Raytown Water Company for an Order Authorizing Issuance of Preferred Stock))
Stock	

RESPONSE TO STAFF RECOMMENDATION

COMES NOW the Office of the Public Counsel ("OPC") and for its *Response to*Staff Recommendation, states as follows:

- 1. Raytown Water Company ("Raytown") submitted an application, in compliance with Commission Rule 20 CSR 4240-10.125, requesting authority to issue preferred stock in a principal sum not to exceed \$5 million on November 4, 2020.
- 2. The staff of the Missouri Public Service Commission ("Staff") filed its recommendation regarding Raytown's application on January 5, 2021. Staff recommended that the Commission approve Raytown's application, subject to five conditions outlined in a *Memorandum* attached to the recommendation.
- 3. The OPC does not oppose the approval of Raytown's application, but the OPC does request that the Commission impose one condition in addition to the five already proposed by Staff in its recommendation. That conditions is thus:

That Raytown Water Company exercise due diligence to determine any options it has to refinance the preferred stock issued pursuant to the Commission's Authority and provide semi-annual updates to the Commission, to be filed in this docket, as to the due diligence it has performed pursuant to this condition.

4. As stated, subject to the imposition of this condition in addition to the five proposed by Staff, the OPC does not oppose Raytown's application or Staff's recommendation.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission accept this *Response to Staff Recommendation* and grant such other relief as is just and reasonable under the circumstances.

Respectfully submitted,

By: /s/ John Clizer
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this fifteenth day of January, 2021.

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