

**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)
Seven Springs Sewer & Water, LLC) **File No. SM-2022-0131**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, through counsel, and recommends the Commission authorize the sale of sewer utility assets belonging to TUK, LLC (TUK) to Seven Springs Sewer & Water, LLC (Seven Springs). Staff further recommends that Seven Springs be issued a new certificate of convenience and necessity (CCN) to provide sewer service in the territory currently served by TUK and that TUK's CCN be cancelled. In support, Staff states as follows:

1. TUK and Seven Springs filed their joint *Application and Motion for Waiver* (Application) on November 10, 2021. In it, the parties seek Commission authority for TUK to sell its sewer assets located in Jefferson County, Missouri to Seven Springs and for TUK's accompanying CCN to be transferred to Seven Springs. As an alternative to transferring TUK's CCN, the parties request that Seven Springs be issued a new CCN in order to provide sewer service in TUK's current service territory.

2. In their Application, the parties request a waiver of the 60 day notice requirements of 20 CSR 4240-4.017(1). The parties verified that in the prior 150 days they had no Commission communication regarding any issue likely to be substantive in this case. Staff does not oppose this request.

3. On December 27, 2021, the Commission ordered Staff to file its recommendation by March 16, 2022.

4. Pursuant to §393.170, RSMo, no sewer corporation shall provide service to consumers without first obtaining Commission approval. Section 393.190, RSMo requires Commission approval prior to a transfer of utility assets.

5. The Commission has articulated criteria to be used when evaluating CCN applications: (1) there must be a need for the service, (2) the applicant must be qualified to provide the proposed service, (3) the applicant must have the financial ability to provide the service, (4) the applicant's proposal must be economically feasible, and (5) the service must promote the public interest.¹ These factors are referred to as the "Tartan factors." In addition to the Tartan factors, when considering applications involving existing water and/or sewer systems, the Commission analyzes the applicant's Technical, Managerial, and Financial (TMF) capabilities.

6. As explained in the Staff *Memorandum*, attached, Staff investigated TUK and Seven Springs' request. Based upon this request, Staff determined that Seven Springs possesses the necessary TMF capabilities and fulfils the requirements of the Tartan factors. Accordingly, Staff asserts that approving the utility's sale to Seven Springs is not detrimental to the public interest and that issuance of a CCN to Seven Springs is necessary or convenient for the public service. Staff recommends 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 parties' Application. Staff further recommends that TUK's CCN and tariff be cancelled and that Seven Springs be granted a CCN to provide sewer

¹ *In re Intercon Gas, Inc.*, 30 Mo. P.S.C. 554, 561 (1991); *In re Application of Tartan Energy Co.*, 3 Mo. P.S.C.3d 173 (1994).

service in the territory currently served by TUK, with conditions described in the *Staff Memorandum*.

7. The Commission need not hold a hearing if, after proper notice and opportunity to intervene, no party requests a hearing.² Should no party or individual request a hearing in this matter, the Commission need not hold a hearing to allow the utility's sale and issue a CCN to Seven Springs.

WHEREFORE, Staff submits this *Staff Recommendation* for the Commission's information and consideration.

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz
Deputy Counsel
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CERTIFICATE OF SERVICE

I certify that the foregoing has been emailed to counsel of record on this 16th day of March, 2022.

/s/ Karen E. Bretz

² *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo.App. W.D. 1989).

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. SM-2022-0131

FROM: Angela Niemeier – Auditing Department
Deborah Bernsen – Customer Experience Department
Amanda Coffey – Engineering Analysis Department
Andrew Harris, P.E. – Water, Sewer & Steam Department
Keri Roth – Water, Sewer & Steam Department

/s/ Keri Roth 3/16/2022
Senior Research/Data Analyst

/s/ Karen Bretz 3/16/2022
Deputy Counsel

SUBJECT: Recommendation of Approval of Application

DATE: March 16, 2022

Case Background

On November 10, 2021, TUK, LLC (“TUK”) and Seven Springs Sewer & Water LLC (“Seven Springs”) filed an *Application and Motion for Waiver* (“Application”) with the Missouri Public Service Commission (“Commission”).

TUK seeks the authority to sell, and Seven Springs requests permission to acquire the assets TUK uses to provide sewer utility services. Additionally, Seven Springs requests to acquire TUK’s Certificate of Convenience and Necessity (“CCN”) to operate the sewer system assets and provide service to the public. In the alternative, Seven Springs requests a new CCN be issued authorizing it to own, install, construct, operate, control, manage, and maintain the sewer system it requests to acquire from TUK.

On November 16, 2021, the Commission issued its *Order and Notice* directing notice of the application be given to the county commission of Jefferson County, Missouri, setting a deadline for intervention requests, and directing filing of the staff recommendation or status report. On December 13, 2021, Staff filed a *Status Report*, requesting the Commission establish a filing date for Staff’s Recommendation of March 16, 2022. On December 27, 2021, the Commission issued its *Order Setting Deadline for Staff Recommendation and Time for Responses* setting a deadline for Staff to file its Recommendation no later than March 16, 2022. No parties sought to intervene in the case, and to date, no one has entered a public comment in this docket.

Background of TUK, LLC

TUK obtained a sewer CCN from the Commission with an effective date of November 21, 2015, in Case No. WA-2015-0169 to provide regulated sewer service to approximately 26 residential customers and one mobile home park in Jefferson County, MO. While the application filed in the

CCN case initially requested CCNs for both water and sewer systems, the request for the water system was withdrawn through a *Unanimous Stipulation and Agreement*, as attached to the *Order Approving Stipulation and Agreement and Granting Certificate of Convenience and Necessity* issued October 22, 2015. In the *Unanimous Stipulation and Agreement*, TUK agreed to not charge customers for water and not connect any new water customers, unless it later applied for and was granted a water CCN. Additionally, TUK filed a sewer rate case January 31, 2017, Case No. SR-2017-0206, which was ultimately withdrawn. The current owners of TUK reside in Massachusetts.

Background of Seven Springs Sewer & Water LLC

Seven Springs is a newly formed limited liability company that received a Certificate of Good Standing from the Secretary of State on October 26, 2021.

The principal of Seven Springs, Mr. Lawrence Harrison, has recently purchased the water system (unregulated), mobile home park and three duplex units which accounts for over 50% of the customers currently served by TUK's sewer system.

Staff's Investigation

Staff from the Water, Sewer & Steam Department investigated the sewer system, including system compliance with environmental regulations. Among the records reviewed as part of the investigation was information from DNR records, the operating permit, and previous inspection reports.

Staff performed a physical field inspection of the sewer system on December 9, 2021. This inspection included an on-site review of the current condition of the system and a walk-thru discussion with the system operator covering the lagoon cells, the lift station, and the collection system.

Description of the Sewer System

The system consists of two separate gravity flow collecting sewers that each flow to a lift station which conveys the sewage to the center of the first cell of a facultative three-cell lagoon, with sludge retention in the lagoon. The original lines were constructed in the 1960s to serve the mobile home park ("MHP"). Later, expansion of the system was completed to serve 6 duplex units and 20 single family homes. In 1995, the original single-cell lagoon was removed and new lines were constructed to expand the system from the original lagoon site to the current three-cell site.

DNR Permit and Inspections

The system operates under permit number MO-0115223, with an effective date of July 1, 2018 and an expiration date of June 30, 2023. Per the permit, the design flow is 49,500 gallons per day ("gpd"), the adjusted design flow is 14,999 gpd, and the actual flow is 11,800 gpd. At the current actual flow, the system generally operates as a reported no-discharge facility except during periods

of heavy rain. Also noted in the permit is a determination that the current operation has no reasonable potential to cause an excursion of limits for ammonia that could potentially require additional treatment. This determination would be revisited by DNR should future flows increase significantly.

The most recent DNR inspection report for the facility is dated June 29, 2018. At that time, the unsatisfactory findings were a delinquent monitoring report and a missing outfall sign.

Staff Observations of the Sewer System

Staff's field observations and discussion with the operator revealed an apparent partial blockage between the lift station and the first lagoon cell, fencing repair needs, and collection system integrity concerns related to increased flow during periods of heavy rain.

During a January 3, 2022 conference call between Staff and TUK and Seven Springs' principals, field inspection observations were discussed. Staff's understanding, based on information received during the January 3rd call, is that TUK will repair the fencing as needed and clear the line from the lift station prior to closing, if not sooner. According to the operating permit, the facility is not currently required to develop or implement a program for maintenance and repair of the collection system. During the call, however, Mr. Harrison, principal of Seven Springs, explained that some investigative work has been completed for collection system integrity. The collection system is reported to be substantially intact, and identification of line locations that are impacted by root intrusion have been prioritized for repair as needed. Further, Mr. Harrison intends to retain the current system operator to retain system operational and maintenance continuity.

Service Area

The system serves an unincorporated portion of Jefferson County, Missouri, and is located just south of the city of Eureka. The requested service area for Seven Springs mirrors the existing service area of TUK with no changes.

Rate Base

Plant-In-Service Balances

The Auditing Department reviewed information TUK provided in response to Staff's data requests, Seven Springs' Application with included sale agreement documents, and TUK's annual reports and invoices. TUK has maintained the plant-in-service records for the sewer system from approximately 2015 to current. Staff has determined appropriate depreciation rates for each Uniform System of Accounts ("USOA") category of plant-in-service for sewer operations. Based upon the supported levels of plant-in-service and depreciation rates, Staff determined the appropriate balances of accumulated depreciation for the sewer system. In addition, Staff

determined contribution in aid of construction (“CIAC”) based on TUK’s prior CCN case, Case No. WA-2015-0169.

Staff determined the value of net plant investment, or “rate base,” by studying documentation of invoices, along with annual depreciation expense, and whether plant facilities or money was contributed by customers or land developers. Based upon Staff’s analysis, the net book value of the sewer assets proposed to be purchased from TUK by Seven Springs as of December 31, 2021, is approximately \$31,192.

The following is a breakdown of the rate base components:

	Sewer
Plant-in-Service	\$ 49,432
Accumulated Depreciation	\$ 11,620
CIAC	\$ 11,239
Net Plant minus CIAC	\$ 26,573
CIAC Amortization	\$ 4,619
Net Rate Base	\$ 31,192

Depreciation

Staff recommends the use of the depreciation rates ordered by the Commission in TUK’s CCN case, Case No. WA-2015-0169. Any accounts that were not previously ordered in the aforementioned case are consistent with Staff’s standard sewer depreciation rates. These depreciation rates are included as Attachment A.

Customer Experience

Publicity and Customer Notice

The current owners of TUK indicated that they believed that the customers were aware of the pending sale. Seven Springs has stated it does not object to sending a letter to these customers if Staff believes it would be helpful. Staff recommends that Seven Springs be required to send a written communication to the customers after closing on the assets to affirm methods of communication with the customer, billing and any other areas. This communication should also include an informational brochure detailing the rights and responsibilities of the utility and its customers that is required by Commission Rule 20 CSR 4240-13.040(3). Staff recommends that Seven Springs be required to send copies of communications and the brochure to Staff along with a statement regarding when these were sent to customers.

Customer Service and Billing

TUK currently operates an office in Eureka. Seven Springs has indicated that it will continue to utilize this office. Customers may contact Seven Springs by calling or visiting the office during

business hours (9:00 a.m. to 6:00 p.m.) or sending an email to the office manager/bookkeeper. Customers will be provided an emergency number to be used to contact Seven Springs on a 24/7 basis. This number will appear on the bill as well as Seven Springs' brochure to be provided to customers. Contact methods for the customer to use are included on the customer brochure, the website, and all written materials sent to customers.

TUK utilizes Rent Manager software to maintain customer information, billing history and to produce billing statements for the customers. The office manager/bookkeeper, who is a full-time employee of the mobile home park, will continue to utilize the same software, produce bills and post payments for Seven Springs' customers. Bills are mailed quarterly and are for a flat fee. Staff recommends that Seven Springs provide five (5) customer billing statements to Customer Experience Staff from the first billing cycle to allow Staff to review billing accuracy.

Customers may pay their bills by cash, check or money order. Checks or money orders may be mailed or dropped off at the office. Cash is also accepted at the office. Customers will be able to make inquiries and issue complaints with Seven Springs using email to the office manager/bookkeeper, phone or in person at the office. The office manager/bookkeeper will record these complaints, attempt to resolve them and maintain a record of them.

The office manager/bookkeeper has responsibilities associated with sewer operations, in addition to responsibilities managing the mobile home park. There is no contract nor written document outlining the office manager/bookkeeper's responsibilities for the sewer operations. In addition, there is no timesheet or other document that keeps a record of what activities the office manager/bookkeeper conducts for the sewer operations and how many hours it takes to complete these activities. Staff recommends that the office manager/bookkeeper maintain a timesheet to record activities performed and the amount of time expended on these duties.

Rate and Tariff Matters

In the Application, Seven Springs proposes to adopt the existing tariffs and rates of TUK. TUK's current rates are as follows:

Residential Quarterly Flat Rate	\$ 126.41
Mobile Home Park Quarterly Flat Rate (includes all mobile home units)	\$ 2,528.18

Staff supports Seven Springs' proposal to adopt TUK's sewer rates in P.S.C. MO No. 1, with the following modification to be added to the rate sheet:

TAXES - These rates do not include any municipal, state or federal taxes computed on either billing or consumption basis. Any such taxes applicable shall be added as separate items in rendering each bill.

Technical, Managerial, and Financial Capacity

The principal of Seven Springs, Mr. Lawrence Harrison, has never owned a regulated utility. In studying most situations involving the acquisition of existing water and/or sewer systems, Staff utilizes the concepts of technical, managerial, and financial capacity, or “TMF,” originally developed by the United States Environmental Protection Agency.

Technical Capacity

Seven Springs intends to utilize the current contract operator for plant operations. The contract operator will continue routine day-to-day inspections, checks, sampling and reporting for the sewer system, as well as accomplish most system repairs and extraordinary operations tasks as the need arises, to address proper facility operations and customer service matters. As such, it is Staff’s position that Seven Springs has the requisite technical capacities to acquire and operate the TUK sewer system.

Managerial Capacity

Similar to routine facility operations, Seven Springs will continue to utilize the office manager/bookkeeper who is a full-time employee of the mobile home park and will continue to utilize the same software to produce customer bills and post payments for Seven Springs’ customers. Additionally, Seven Springs will continue to utilize the office currently used by TUK. As previously stated, customers will be able to contact Seven Springs by calling or visiting the office during business hours. Payments may also be dropped off at the office or mailed. Mr. Harrison will also be available by telephone at most all times when severe emergencies arise. It is Staff’s position that Seven Springs has the requisite managerial capacities to operate the TUK sewer system.

Financial Capacity

Seven Springs is purchasing TUK with equity in the form of cash payment at closing and will have no debt. The Auditing Department has calculated rate base at \$31,192; therefore, the purchase price of \$25,000 being paid by Seven Springs is less than the next book value of the sewer assets being acquired. Thus, an acquisition premium does not exist. Due to Seven Springs being a brand new utility, Staff does not have any financial data to review Seven Springs’ future financial sustainability. However, Mr. Harrison provided Staff with an affidavit explaining his personal stake in purchasing the MHP, three duplex units, and the water system. Mr. Harrison owns the MHP and duplex units, which accounts for over 50% of the sewer system customer base. Therefore, Mr. Harrison is the largest sewer consumer and has the largest single interest in maintaining the sewer system and continuing safe and adequate service. Mr. Harrison has over \$250,000 of equity in the acquired properties, and has planned improvements and financial commitments to ensure his properties remain in good working order. It is Staff’s position that Seven Springs has the requisite financial capacities to operate the TUK sewer system. However, since Staff was unable to review financial statements for Seven Springs, Staff recommends

Seven Springs' file monthly financial reports in EFIS for the first two years after closing on the sewer assets, if the Commission approves the acquisition.

Tartan Criteria

It is also customary with most cases involving the issuance of a CCN for Staff to utilize the Tartan Criteria when analyzing the request. In the case at hand, Seven Springs has requested the Commission approve the transfer of TUK's existing CCN to it, or alternatively, to issue a new sewer CCN, allowing Seven Springs to serve customers currently on the TUK sewer system.

The Tartan criteria contemplate the following:

1. The need for service;
2. The utility's qualifications;
3. The utility's financial ability;
4. The feasibility of the proposal; and
5. The promotion of the public interest.

Based on Staff's investigation, it is Staff's opinion there is:

1. Both a current and future need for sewer service. The existing customer base for the system being acquired has both a desire and need for service. In addition, there is a need for the necessary steps to be taken to update the sewer system, and to ensure the provision of safe and adequate service. Further, the current owners of TUK, who reside in Massachusetts, have made the decision to exit the sewer utility business, sell the existing system to Seven Springs, and rely upon Seven Springs to properly operate and maintain the existing sewer system in order that customers will continue to have safe and adequate service.
2. As previously noted, Mr. Harrison has never owned a regulated utility. However, the current contract operator and the current office manager/bookkeeper for TUK will continue to be utilized by Seven Springs. Additionally, the current office utilized by TUK will continue to be used.
3. As previously noted, Seven Springs is purchasing TUK with equity in the form of cash payment at closing. Seven Springs will have no debt.
4. Seven Springs' purchase of the system, utilizing the previously approved rates noted above, is financially feasible.
5. Because TUK currently provides service to sewer customers, there is an obvious need for this service. Seven Springs has shown that it is qualified to provide safe and adequate service to TUK's current customers. Seven Springs has the financial ability to purchase the system and operate it safely. Promotion of the public interest is served by Seven Springs' operation of the sewer system. Staff's conclusion is that the points regarding TMF capacities and the Tartan Energy criteria are all met, for this case.

Other Issues

Seven Springs currently does not own or operate a regulated utility and has no obligations due to the Commission, and it has no pending actions before the Commission.

TUK has no overdue Commission annual reports or assessment fees. There is no pending action or final unsatisfied judgment or decision against TUK from any state or federal agency or court which involves customer service or rates, nor has TUK been the recipient of a judgment in the three (3) years prior to the date of this application. Additionally, TUK has no other cases pending before the Commission that would affect this application.

Staff's Conclusions and Recommendations

Staff finds the sale of the TUK sewer utility assets is not detrimental to the public interest, and that granting Seven Springs a CCN is necessary or convenient for the public service. Staff recommends 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 parties' Application. Staff further recommends that upon closing of the assets, that TUK's CCN and tariff be cancelled and that Seven Springs be granted a CCN to provide sewer service in the territory currently served by TUK, subject to the following conditions:

1. Require Seven Springs to file notice to adopt the TUK sewer tariffs as P.S.C. MO No. 1 to become effective before closing on the assets;
2. Require Seven Springs to file notice in EFIS of closing on the assets within five (5) days after such closing;
3. If closing on the sewer assets does not take place within thirty (30) days following the effective date of the Commission's order approving such, require Seven Springs to submit a status report within five (5) days after this thirty (30) day period regarding the status of the closing, and additional status reports within five (5) days after each additional thirty (30) day period, until closing takes place, or until Seven Springs determines that the transfer of the assets will occur.
4. If Seven Springs determines that a transfer of the assets will not occur, require Seven Springs to notify the Commission of such, no later than the date of the next status report, as addressed above, after such determination is made, and require Seven Springs to submit tariff sheets as appropriate that would cancel service area maps and descriptions applicable to TUK's service area in its sewer tariff, and rate and charges sheets applicable to customers in the service area in sewer tariff;
5. Require Seven Springs to keep its financial books and records for plant-in-service and operating expenses in accordance with the National Association of Regulatory Utility Commissioners (NARUC) Uniform System of Accounts;

6. Require Seven Springs to adopt the depreciation rates ordered in Case No. WA-2015-0169 and as outlined in Attachment A of this memorandum;
7. Require Seven Springs to file in EFIS monthly financial reports for the first two years following the closing on the sewer assets.
8. Make no finding that would preclude the Commission from considering the ratemaking treatment to be afforded any matters pertaining to the granting of the CCN to Seven Springs, including expenditures related to the certificated service area, in any later proceeding;
9. Require Seven Springs to distribute to its customers an informational brochure detailing the rights and responsibilities of the utility and its customers regarding its sewer service, consistent with the requirements of Commission Rule 20 CSR 4240-13, within thirty (30) days of closing on the assets;
10. Require Seven Springs to file in EFIS an example of its actual communication with the sewer customers of the acquired company regarding its acquisition and operations of the sewer system assets, and how customers may reach Seven Springs, within ten (10) days after closing on the assets;
11. Require Seven Springs to file in EFIS a sample of five (5) billing statements from the first month's billing for Seven Springs within ten (10) days after the initial bill;
12. Require timesheets to be maintained by the office manager/bookkeeper tracking the activities and time attributable to functions performed for Seven Springs; and
13. Require Seven Springs to file in EFIS in this case outlining completion of the above-recommended customer brochure, communications, and billing for Seven Springs within ten (10) days after such communications and notifications.

Attachments

- A. Depreciation Schedule

TUK, LLC Water Company
SCHEDULE of DEPRECIATION RATES
WATER
SM-2022-0131

NARUC USOA ACCT		DEPRECIATION	AVERAGE SERVICE LIFE	NET
No.	ACCOUNT DESCRIPTION	RATE	(YEARS)	SALVAGE
Source of Supply				
311	Structures & Improvements	2.5%	44	-10%
314	Wells & Springs	2.0%	55	-8%
Pumping Plant				
321	Structures & Improvements	2.5%	44	-10%
325.1	Submersible Pumping Equipment	10.0%	12	-20%
325.2	High Service or Booster Pumping Equip.	6.7%	15	0%
Water Treatment Plant				
331	Structures & Improvements	2.5%	44	-10%
332	Water Treatment Equipment	2.9%	35	0%
Transmission and Distribution				
342	Distribution Reservoirs & Standpipes	2.5%	42	-5%
343	Transmission & Distribution Mains	2.0%	50	0%
345	Customer Services	2.5%	40	0%
346.1	Customer Meters, Plastic Components	10.0%	10	0%
347	Customer Meter Pits & Installation	2.5%	40	0%
348	Hydrants	2.0%	50	0%
General Plant CLASS D				
371	Structures & Improvements	2.5%	40	0%
372	Office Furniture & Equipment	5.0%	20	0%
372.1	Office Electronic & Computer Equip.	20.0%	5	0%
373	Transportation Equipment	13.0%	7	9%
379	Other General Equipment (tools, shop equip., backhoes, trenchers, etc.)	10.0%	8.7	13%

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)

AFFIDAVIT OF DEBORAH ANN BERNSEN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)


COMES NOW DEBORAH ANN BERNSEN, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*, and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.


DEBORAH ANN BERNSEN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of March, 2022.


Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

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)
Seven Springs Sewer & Water LLC)
File No. SM-2022-0131

AFFIDAVIT OF AMANDA COFFER

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW AMANDA COFFER, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*, and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

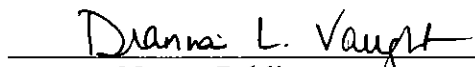


AMANDA COFFER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 15th day of March, 2022.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377



Notary Public

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)

AFFIDAVIT OF ANDREW HARRIS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ANDREW HARRIS, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*, and that the same is true and correct according to his best knowledge and belief.

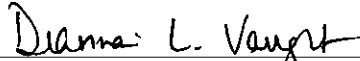
Further the Affiant sayeth not.



ANDREW HARRIS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 15th day of March, 2022.



Notary Public

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

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)

AFFIDAVIT OF ANGELA NIEMEIER

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ANGELA NIEMEIER, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*, and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

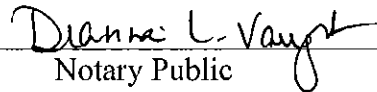


ANGELA NIEMEIER

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of March, 2022.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377



Notary Public

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)
Seven Springs Sewer & Water LLC) File No. SM-2022-0131

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW KERI ROTH, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*, and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Keri Roth
KERI ROTH

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of March, 2022.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2023
Commission Number: 15207377

Dianna L. Vaught
Notary Public