

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

In the Matter of Central Rivers Wastewater Utility, Inc.	)	
For a Certificate of Convenience and Necessity	)	
Authorizing it to Construct, Install, Own, Operate,	)	<b><u>File No. SA-2014-0005</u></b>
Maintain, Control and Manage a Sewer System	)	
in Clinton County, Missouri	)	

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and hereby submits its *Staff Recommendation*, stating as follows:

1. On July 2, 2013, Central Rivers Wastewater Utility, Inc. ("CRW") filed an application before the Public Service Commission ("Commission") seeking a Certificate of Convenience and Necessity ("CCN") authorizing it to construct, install, own, operate, maintain, control and manage a sewer system in Clinton County, Missouri.

2. On July 3, 2013, the Commission entered an *Order Directing Notice and Setting Date for Submission of Intervention Requests*, which directed that notice be given and any party wishing to intervene do so by August 5, 2013. No other party sought to intervene.

3. On August 7, 2013, the Commission entered an *Order Directing Staff Recommendation*, which ordered Staff to file its recommendation regarding the application no later than September 6, 2013.

4. On September 6, 2013, Staff requested an extension for filing its recommendation, which the Commission granted, ordering Staff to file its recommendation no later than October 7, 2013.

5. According to Section 393.170.3 RSMo (2000), the Commission has the “power to grant [a certificate of convenience and necessity]. . . whenever it shall after due hearing determine that such construction or such exercise of the right, [or] privilege . . . is necessary or convenient for the public service. The Commission may by its order impose such condition or conditions as it may deem reasonable and necessary.”

6. The Commission established five criteria in *In re Tartan Energy Company*, 3 Mo. P.S.C. 3d 173, 177 (1994), for consideration when making a determination in an application case: (1) there must be a need for the service; (2) the applicant must be qualified to provide the 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.

7. Staff has determined that CRW has met all five *Tartan Energy* criteria. For this and other reasons, as detailed in Staff's Memorandum, attached hereto and incorporated by reference as Appendix A, Staff recommends the Commission approve CRW's application for a CCN.

**WHEREFORE,** Staff respectfully requests the Commission issue an order granting Central Rivers Wastewater Utility, Inc., a certificate of convenience and necessity to provide water and sewer service to the service areas described in Staff's Memorandum.

Respectfully submitted,

**/s/ Amy E. Moore**

Amy E. Moore  
Deputy Counsel  
Missouri Bar No. 61759

Akayla J. Jones  
Legal Counsel  
Missouri Bar No. 64941

Attorneys for the Staff of the  
Missouri Public Service Commission  
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Jefferson City, MO 65102  
(573) 751-4140 (Telephone)  
(573) 751-9285 (Fax)  
amy.moore@psc.mo.gov

#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 7th day of October, 2013.

**/s/ Amy E. Moore**

## **MEMORANDUM**

TO: Missouri Public Service Commission Official Case File  
File No. SA-2014-0005  
Central Rivers Wastewater Utility, Inc.

FROM: Jim Merciel - Water & Sewer Unit, Case Coordinator  
Martin Hummel - Water & Sewer Unit  
Bill Harris - Auditing Unit  
Patricia Gaskins - Auditing Unit  
Matthew Young - Auditing Unit  
John Robinett - Engineering and Management Services Unit

<u>/s/ Jim Busch</u>	<u>10/7/2013</u>
Water and Sewer Unit	Date
<u>/s/ Amy Moore</u>	<u>10/7/2013</u>
Staff Counsel's Office	Date

SUBJECT: Staff Recommendation Regarding Certificate of Convenience and Necessity

DATE: October 7, 2013

### **PROCEDURAL BACKGROUND**

On July 2, 2013, Central Rivers Wastewater Utility, Inc. (CRW) filed an *Application* before the Public Service Commission (Commission or PSC) seeking a Certificate of Convenience and Necessity (CCN) to provide sewer service to the Country Hill Estates subdivision in Clinton County, Missouri.

On July 3, 2013, the Commission issued its *Order Directing Notice and Setting Date for Submission of Intervention Requests* which directed the Commission's Data Center to provide a copy of the order to the County Commission of Clinton County, Missouri and the Missouri Department of Natural Resources (DNR), and directed the Commission's Public Information Officer to make notice of the order available to the members of the General Assembly representing Clinton County, Missouri and to the media serving Clinton County, Missouri. This order also established a deadline of August 5 for interested parties to submit requests to intervene in the case. No requests to intervene in the case were submitted to the Commission.

On August 7, 2013 the Commission issued another *Order Directing Notice and Setting Date for Submission of Intervention Requests* which directed the Staff to file a recommendation regarding this case no later than September 6, 2013. On September 9, 2013 Staff filed its *Staff's Request for Extension*, and then on the same date the Commission issued its *Order Granting Extension*

**APPENDIX A**

*For Staff Recommendation* in which it granted an extension of the Staff filing date to October 7, 2013. This memorandum is being filed to comply with the Commission's orders of August 7, 2013 and September 9, 2013.

## **BACKGROUND OF CRW**

CRW was incorporated in December 1997. The Commission granted a CCN to CRW to provide sewer service in Case No. SA-98-530 on May 25, 1999. CRW added additional service areas (subdivisions) with the approval of the Commission in subsequent cases.<sup>1</sup> CRW's current approved service areas, locations, and approximate customer counts, are as follows:

Subdivision	County	Number of Customers
Countryside Meadows	Ray	7
Fox Run	Clay	39
Wilmar Estates	Clay	63
Park Estates (Barr-B Acres)	Clay	46
Private Gardens	Clay	43
Berkshire Glen	Clay	30

Total customers in existing approved service areas: 228

CRW is presently providing service in the proposed Country Hill Estates service area. There are thirty (30) lots in the subdivision. The proposed service area presently has nine (9) customers, which brings CRW's actual total customer count to 237.

The Country Hill Estates service area utilizes an existing wastewater treatment facility that is a recirculating sand filter with design flow capacity of 11,100 gallons per day, and design load of 111 population equivalent (persons). This capacity is adequate to serve the proposed service area, and this treatment facility is of the same type that CRW uses in its other service areas. This type of treatment facility also requires the use of septic tanks located on each customer's premises, along with the use of an electric effluent pump located in each septic tank, called a septic tank effluent pump (STEP). The collecting sewers are pressurized small-diameter pipelines, pressurized by customers' STEP pump units. The construction of the sewer system is complete, DNR has issued an operating permit for the system MO-0132144, and the system is being utilized to provide service to the existing residences.

## **STAFF'S INVESTIGATION AND RATE BASE OVERVIEW**

Items reviewed during the Staff's investigation of CRW's Application included the overall plans for providing service to the area, including investment in the sewer system, the appropriateness

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<sup>1</sup> CRW's additional service areas were granted in case numbers SA-2000-105, SA-2000-248, SA-2001-304, SA-2004-0470 and SA-2005-0302.

of the proposed customer rates for the system, the applicability of CRW's existing depreciation rates to the system and CRW's technical, managerial and financial capacities.

The Staff also spoke by phone with DNR's Kansas City Regional Office to verify that other government requirements are being met. There are no unresolved issues with respect to DNR.

Additionally, the Staff analyzed CRW's ability to meet the points outlined with discussion by the Commission in its Report and Order in Case No. GA-94-197, effective on October 1, 1994, and commonly referred to by Staff as the "Tartan Energy Criteria." These are the criteria that have been used by the Commission for many years in evaluating service area certificate applications. The Tartan Energy Criteria, with titles of the criteria modified from the Report and Order by Staff for general use, are set out within this Memorandum below.

#### **STAFF'S FINDINGS AND CONCLUSIONS**

CRW's current Commission-approved rate of \$32 per month per customer was established in CRW's initial CCN case, Case No. SA-98-530. This rate was based on both actual expenses and pro forma estimates at the time. Based on a review of CRW's application, its Annual Reports to the Commission and its responses to Staff data requests, the Staff recommends that CRW's existing rate should also be applied to the Country Hill Estates service area. CRW has an existing approved connection charge for each customer of either \$4,500 or \$4,800, depending on the size of the residence, for construction of a STEP system. Staff also recommends that this charge apply to the proposed new service area. CRW has existing depreciation rates prescribed by the Commission in CRW's first CCN case, SA-98-530, and Staff recommends that these approved depreciation rates also apply to plant items located in the Country Hill Estates service area.

However, since CRW's existing rates are based on pro-forma information from its earliest CCN case, Staff recommends that a full audit of CRW be undertaken. Staff specifically recommends that CRW file a request for a rate increase before the Commission within six (6) months after the effective date of an order from the Commission granting a CCN for the Country Hill Estates service area. If CRW does not file a rate request within that time frame, then the Staff will initiate a full audit.

CRW has a contract that it entered into with the developer of the Country Hill Estates subdivision. The Staff has some concerns about the contract and how it could adversely affect company operations in the long term. Specifically, it is not clear whether CRW's refund to the developer in the amount of \$500 is on a per-lot basis, or on a per-customer basis, as customers actually connect and pay sewer bills. If CRW has invested this amount on a per-lot basis, then the existing customers would be supporting an artificially high rate base amount. Also, Staff is concerned with CRW's reliance on the developer's obligation to pay \$20 per month per unbuilt lot until homes are constructed on twenty-six (26) lots. In the event fewer than twenty-six (26) lots are built upon by customers, there is no guarantee the developer will be around indefinitely to pay the \$20 per lot to CRW. Finally, ownership of the treatment facility does not transfer to

CRW until homes on all thirty (30) lots are connected to the central sewer system. Staff has a concern whether or not CRW will have permanent unrestricted access to the treatment facility. After its investigation, Staff believes there is no reason why ownership of the property cannot be attained. Staff therefore recommends that CRW acquire ownership of the property upon which the treatment facility is located within thirty (30) days after the effective date of an order from the Commission granting a CCN for the Country Hill Estates service area. As an alternative Staff recommendation, CRW should acquire a permanent easement, filed with the recorder of deeds in Clinton County, to have sole access to the wastewater treatment facility for any reason including daily operations and to bring in necessary equipment to undertake operations, repairs, modifications and additional construction. In addition to an exclusive easement, CRW should enter into a new agreement with the current owner (developer) of the wastewater treatment facility that would prohibit the developer from altering, modifying or in any way changing the wastewater treatment facility and further agree that this facility will not be sold, assigned, transferred or in any way change ownership unless it is to CRW or a successor entity. Further, CRW will have the exclusive use of the wastewater treatment facility to meet its obligation to serve its utility customers and construct, install, operate, maintain, control, manage and make all necessary repairs to the facility as needed.

Despite these concerns, Staff takes the position that the actual impact of the financial aspects of these matters can be addressed in a subsequent rate case or Staff-initiated audit. Therefore, Staff recommends that a CCN be granted to CRW for authority to own and operate the sewer system in Country Hill Estates, and provide service to the residents within the service area.

Staff recommends that CRW apply its existing Commission-approved depreciation rates to this new service area. Staff also recommends that, subsequent to the Commission granting CRW a CCN for the subject service area, CRW amend its existing tariff by filing both new and revised tariff sheets with the Commission for its approval. New tariff sheets will need to include a map and a written description of the Country Hill Estates service area, and include other revised tariff sheet(s) to show that the Company's existing customer rates apply to the new proposed service area.

## **THE TARTAN ENERGY CRITERIA**

### **Is there a need for the Company's proposed services?**

The Staff believes that a need for the proposed service clearly exists. There is no other sewer system available proximate to Country Hill Estates. The proposed service utilizes a small diameter pressure collecting sewers system, which is well suited for service to the large platted lots. The wastewater will be treated using a recirculating sand filter, which can consistently deliver treated water that meets environmental requirements. This is the same technology that CRW uses in its other service areas.

**Is the Company qualified to provide the proposed service?**

Based on its investigation and its familiarity with CRW, the Staff believes that CRW has the technical, managerial and financial capacities necessary to provide the proposed service in this requested service area. The operations supervisor has several years of experience operating water and wastewater utilities, and is a certified operator in both fields. The owner/manager also has several years of experience in utility construction.

**Does the Company have the financial ability to provide the proposed services?**

CRW has demonstrated, in this and other service areas, its ability to partially fund capital needs of new sewer system development, augmented by developer contributions. For the Country Hill Estates operation, the developer provided all except \$500 per lot of the capital expense required to construct the sewer system, leaving CRW with an existing original cost investment of \$500 per lot less depreciation to be included as rate base. CRW has also demonstrated its ability to fund capital needs for daily operating costs for its various service areas. For the Country Hill Estates operation, the developer also agreed to provide a \$20 per month “availability charge,” to be used to pay operating expenses, and although it has concerns about sustainability of this revenue source, Staff believes that CRW is financially capable of including operations of the Country Hill system into its existing operations even if this additional revenue were to cease.

**Is the Company's proposal economically feasible?**

The Staff is of the opinion that the proposal to utilize the Company's existing company-wide monthly rate of \$32 as applicable for this system is appropriate for purposes of this CCN and will not adversely affect the success of the development, nor adversely impact CRW's existing customers. However, Staff notes that this rate has been in effect since CRW's first CCN case in 1998. Although complete audit information for CRW's expenses is not available at this time, it appears to Staff that revenue generated by Country Hill customers would be sufficient to pay for incremental operating expenses, and along with the developer-subsidized availability revenue CRW would be able to realize allocated costs. Based on the additional service territory, and time that has passed since the original rates were approved, Staff recommends that the Company file for a rate request within six-months of the approval of this application. Additionally, the treatment facility that has been installed to serve the proposed service area, similar to CRW's other treatment facilities, and its cost of operation would be similar to the other treatment facilities. This type of treatment facility is expected to have a long service life, and has the capability to meet the environmental discharge limits that are presently required, and it is thus not anticipated that significant capital expenditures will be required for quite some time.

**Does the Company's proposal promote the public interest?**

CRW's proposed sewer service fulfills one of the requirements that make new home construction possible in this portion of unincorporated Clinton County. As such, it is in the public interest. Additionally, Staff is of the opinion that if the other four criteria are met, relating to need for



service, qualifications of the company, financial capability and feasibility, then this criterion is also met.

#### **ADDITIONAL INFORMATION**

The Staff has reviewed CRW's compliance history and found that CRW is current with respect to its filings of Annual Reports to the Commission. However, CRW has been delinquent on paying its past thirteen quarterly PSC Annual Assessment payments dating back to April 15, 2010. The past two quarterly payments, due on April 15<sup>th</sup>, 2013 and July 15<sup>th</sup>, 2013 were not remitted by CRW until September 19, 2013.

#### **OBLIGATIONS OF REGULATED UTILITIES**

Staff notes that in some past CCN cases the Commission has reminded water and/or sewer utilities, in orders approving certificates, that failure to comply with its regulatory obligations may result in the assessment of penalties against it. These regulatory obligations include, but are not limited to, the following:

- A) The obligation to file an annual report, as established by Section 393.140(6), RSMo 2000. Failure to comply with this obligation will make the utility liable for a penalty of \$100 and an additional \$100 per day that the violation continues. Commission Rule 4 CSR 240-3.640 requires water utilities to file their annual report on or before April 15 of each year.
- B) The obligation to pay an annual assessment fee established by the Commission, as required by Section 386.370, RSMo 2000. Because assessments are facilitated by order of the Commission, failure to comply with the order will subject the company to penalties ranging from \$100 to \$2000 for each day of noncompliance pursuant to Section 386.570, RSMo 2000.
- C) The obligation to provide safe and adequate service at just and reasonable rates, pursuant to Section 393.130, RSMo 2000.
- D) The obligation to comply with all relevant state and federal laws and regulations, including but not limited to, rules of this Commission, the Department of Natural Resources, and the Environmental Protection Agency.
- E) The obligation to comply with orders issued by the Commission. If the company fails to comply it is subject to penalties for noncompliance ranging from \$100 to \$2000 per day of noncompliance, pursuant to Section 386.570, RSMo 2000.
- F) The obligation to keep the Commission informed of its current address and telephone number.

Although Staff is recommending that the requested CCN be approved, this recommendation is

conditioned on the Commission ordering CRW to comply with all of the above-mentioned obligations. Moreover, Staff asserts that if the Commission finds, upon conducting a hearing, that the company fails to provide safe and adequate service, or has defaulted on any indebtedness, the Commission has the authority to petition the circuit court for an order attaching the assets, and placing the company under the control of a receiver, as permitted by Section 393.145, RSMo 2000.

Additionally, the Staff notes that CRW currently has no other matters pending before the Commission. Therefore, approval of the Company's Application in this case will not affect any other matter before the Commission.

The Staff has also reviewed CRW's current operations and found that the Company's efforts in properly operating its facilities are diligent. There has been very little recent activity with regard to consumer inquiries concerning the Company's operations. DNR has not issued any notices of violations to CRW for any of its systems. Also, as noted previously, DNR has issued an operating permit for the Country Hill Estates system.

#### **STAFF'S RECOMMENDATIONS**

Based upon the above, the Staff recommends that the Commission issue an order that:

1. Grants CRW a certificate for the provision of sewer service to the Country Hill Estates subdivision as requested in its Application, with the certificate to be effective on the same date as the effective date of the Company's new and revised tariff sheets to be submitted, as described herein;
2. Approves the Company's existing customer rate of \$32.00 per month, along with existing connection charges and service charges, to be applicable to the Country Hills Estates service area;
3. Approves the Company's existing approved depreciation rates that were prescribed by the Commission in Case No. SA-98-530 to be applicable to the Country Hill Estates service area;
4. Directs CRW to submit new and revised tariff sheets for its existing tariff, including a map and written description of the Country Hill Estates service area, including reference to the Country Hill Estates service area within the index in the tariff, and indicating the applicability of the existing customer rates and service charges to this service area, within 30 days after the date the Commission issues its order granting the CCN, with the tariff sheets to bear an effective date that is at least 30 days from the date the tariff sheets are submitted to the Commission;

5. Requires CRW to file a request for a rate increase before the Commission within six (6) months after the effective date of an order from the Commission granting a CCN for the Country Hill Estates service area;
6. Requires CRW to acquire ownership of the property upon which the treatment facility is located within thirty (30) days after the effective date of an order from the Commission granting a CCN for the Country Hill Estates service area, or alternatively, to acquire a permanent easement, filed with the recorder of deeds in Clinton County, to have sole access to the wastewater treatment facility as described herein;
7. Requires CRW, if it obtains an easement instead of property acquisition, to enter into a new agreement with the current owner (developer) of the wastewater treatment facility that would prohibit the developer from altering, modifying or in any way changing the wastewater treatment facility and further agree that this facility will not be sold, assigned, transferred or in any way change ownership unless it is to CRW or any successor entity;
8. Requires CRW, if it enters into a new agreement with the current owner (developer), to include in that agreement that CRW will have the exclusive use of the wastewater treatment facility to meet its obligation to serve its utility customers and construct, install, operate, maintain, control, manage and make all necessary repairs to the facility as needed;
9. Orders CRW to comply with all Missouri statutes and Commission rules and specifically to file all its Annual Reports to the Commission and pay all its PSC Annual Assessments, in accordance with PSC rules, on a timely basis, beginning with the PSC Assessment installment due on October 15, 2013; and,
10. Makes no finding that would preclude the Commission from considering the ratemaking treatment to be afforded any matters pertaining to the granting of the requested CCN, including future expenditures by CRW, in any later proceeding.

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

In the Matter of Central Rivers Wastewater     )  
Utility, Inc. for a Certificate of Convenience     )  
and Necessity Authorizing it to Construct,     )     File No. SA-2014-0005  
Install, Own, Operate, Maintain, Control and     )  
Manage a Sewer System in Clinton County,     )  
Missouri     )

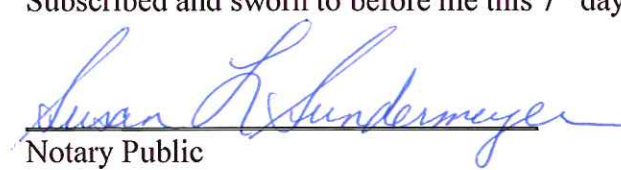
AFFIDAVIT OF JAMES A. MERCIEL, JR., P.E.

STATE OF MISSOURI     )  
   ) ss  
COUNTY OF COLE     )

James A. Merciel, Jr., P.E., of lawful age, on his oath states: (1) that he is the Assistant Manager – Engineering in the Water and Sewer Unit of the Missouri Public Service Commission; (2) that he participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by him; (4) that he has knowledge of matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that such matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
James A. Merciel, Jr., P.E.

Subscribed and sworn to before me this 7<sup>th</sup> day of October 2013.

  
\_\_\_\_\_  
Notary Public

SUSAN L. SUNDERMEYER Notary Public - Notary Seal State of Missouri Commissioned for Callaway County My Commission Expires: October 03, 2014 Commission Number: 10942086
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Missouri )

File No. SA-2014-0005

**AFFIDAVIT OF MARTIN HUMMEL**

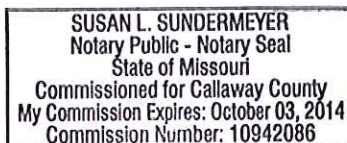
STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

Martin Hummel, of lawful age, on his oath states: (1) that he is a Utility Engineering Specialist in the Water and Sewer Unit of the Missouri Public Service Commission; (2) that he participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by him; (4) that he has knowledge of matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that such matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Martin Hummel

Subscribed and sworn to before me this 7<sup>th</sup> day of October 2013.

  
\_\_\_\_\_  
Notary Public



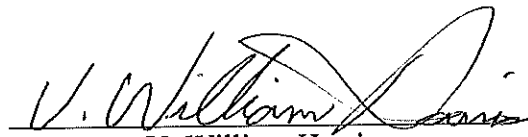
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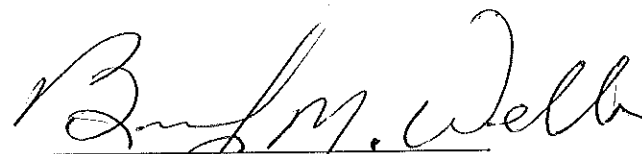
AFFIDAVIT OF V. WILLIAM HARRIS

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF Jackson )

**COMES NOW** V. William Harris, being of lawful age, and on his oath states the following: (1) that he is a Utility Regulatory Auditor III in the Missouri Public Service Commission's Auditing Unit; (2) that he participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by him; (4) that he has knowledge of those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; are true and correct to the best of his knowledge, information, and belief.

  
V. William Harris

Subscribed and sworn to before me this 4th day of October, 2013.

  
Notary Public



BEVERLY M. WEBB  
My Commission Expires  
April 14, 2016  
Clay County  
Commission #12464070

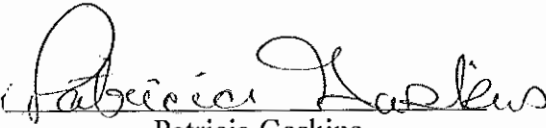
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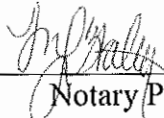
AFFIDAVIT OF PATRICIA GASKINS

STATE OF MISSOURI                                 )  
  )  
COUNTY OF JACKSON                                 )    ss.

**COMES NOW** Patricia Gaskins, being of lawful age, and on her oath states the following: (1) that she is a Utility Regulatory Auditor III in the Missouri Public Service Commission's Auditing Unit; (2) that she participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by her; (4) that she has knowledge of those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; are true and correct to the best of his knowledge, information, and belief.

  
Patricia Gaskins

Subscribed and sworn to before me this 7th day of October, 2013.

  
\_\_\_\_\_  
Notary Public



MICHELE L. WATLEY  
My Commission Expires  
February 6, 2017  
Jackson County  
Commission #13445832

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**


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Missouri    )

Case No. SA-2014-0005


AFFIDAVIT OF MATTHEW YOUNG

STATE OF MISSOURI                                )  
  )  
COUNTY OF Jackson                            )       ss.

**COMES NOW** Matthew Young, being of lawful age, and on his oath states the following: (1) that he is a Utility Regulatory Auditor I in the Missouri Public Service Commission's Auditing Unit; (2) that he participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by him; (4) that he has knowledge of those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; are true and correct to the best of his knowledge, information, and belief.

  
Matthew Young

Subscribed and sworn to before me this 7<sup>th</sup> day of October, 2013.

  
Notary Public



MICHELE L. WATLEY  
My Commission Expires  
February 6, 2017  
Jackson County  
Commission #13445832



**BEFORE THE PUBLIC SERVICE COMMISSION**  
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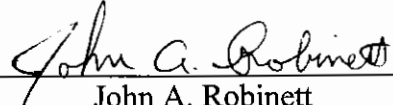
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and Necessity Authorizing it to Construct,    )  
Install, Own, Operate, Maintain, Control and    )  
Manage a Sewer System in Clinton County,    )  
Missouri    )

Case No. SA-2014-0005

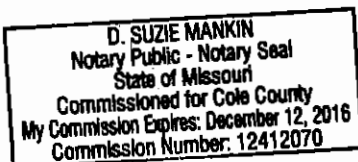
AFFIDAVIT OF JOHN A. ROBINETT

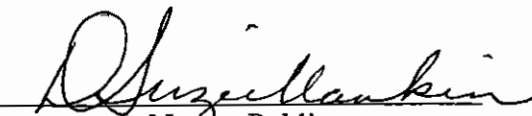
STATE OF MISSOURI        )  
                                      )  
COUNTY OF COLE        )       ss.

**COMES NOW** John A. Robinett, being of lawful age, and on his oath states the following: (1) that he is a Utility Engineering Specialist II in the Missouri Public Service Commission's Engineering & Management Services Unit; (2) that he participated in the preparation of the foregoing *Staff Recommendation Regarding Certificate of Convenience and Necessity*, in memorandum form; (3) that certain information in the *Staff Recommendation Regarding Certificate of Convenience and Necessity* was provided by him; (4) that he has knowledge of those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; and (5) that those matters set forth in the *Staff Recommendation Regarding Certificate of Convenience and Necessity*; are true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
John A. Robinett

Subscribed and sworn to before me this 7<sup>th</sup> day of October, 2013.



  
\_\_\_\_\_  
Notary Public