

Unanimous Agreement WITH ATTACHMENTS AND STAFF AFFIDAVITS

Table of Contents

Unanimous Agreement

Agreement Attachment A:	Ratemaking Income Statement
Agreement Attachment B:	EMS Run
Agreement Attachment C:	Rate Base Worksheet
Agreement Attachment D:	Schedule of Depreciation Rates
Agreement Attachment E:	Example Tariff Sheets
Agreement Attachment F:	Billing Comparison Worksheet
Agreement Attachment G:	Water & Sewer Unit Memorandum
Agreement Attachment H:	Auditing Unit Recommendation Memorandum
Agreement Attachment I:	EMSU Report
Agreement Attachment J:	Summary of Case Events

Staff Participant Affidavits

Note: To browse through this document by item, click on the "Bookmark" tab at the top of the menu bar to the left of the screen and then click on the item that you want to see.

Unanimous Agreement

**UNANIMOUS AGREEMENT REGARDING DISPOSITION
OF SMALL SEWER COMPANY REVENUE INCREASE REQUEST**

SEGES PARTNERS MOBILE HOME PARK L. L. C.

MO PSC FILE NO. SR-2013-0112

BACKGROUND

Seges Partners Mobile Home Park L. L. C. ("Company") initiated the small company revenue increase request ("Request") for sewer service that is the subject of the above-referenced Missouri Public Service Commission ("Commission") File Number by submitting a letter to the Secretary of the Commission in accordance with the provisions of Commission Rule 4 CSR 240-3.050, Small Utility Rate Case Procedure ("Small Company Procedure"). In its request letter, which was received at the Commission's offices on September 19, 2012, the Company set forth its request for an increase of \$3,326 in its total annual sewer service operating revenues. The Company also acknowledged that the design of its customer rates, its service charges, its customer service practices, its general business practices and its general tariff provisions would be reviewed during the Commission Staff's ("Staff") review of the revenue increase request, and could thus be the subject of Staff recommendations. The Company provides service to approximately 58 residential customers.

Pursuant to the provisions of the Small Company Procedure and related internal operating procedures, Staff initiated an audit of the Company's books and records, a review of the Company's customer service and general business practices, a review of the Company's existing tariff, an inspection of the Company's facilities and a review of the Company's operation of its facilities. (These activities are collectively referred to hereinafter as "Staff's investigation of the Company's Request" or "Staff's investigation.")

Upon completion of Staff's investigation of the Company's Request, Staff provided the Company and the Office of the Public Counsel ("Public Counsel") with information regarding Staff's investigation and the results of the investigation, including Staff's initial recommendations for the resolution of the Company's Request.

RESOLUTION OF THE COMPANY'S RATE INCREASE REQUEST

Pursuant to negotiations held subsequent to the Company's and Public Counsel's receipt of the above-referenced information regarding Staff's investigation of the Company's Request, Staff, Public Counsel and the Company hereby state the following agreements:

- (1) The agreed upon revenue requirement increase of \$3,534 (11.31% increase) added to the level of previous revenues of \$31,248 results in overall revenues of \$34,782. This revenue requirement is just and reasonable and designed to recover the Company's cost of service. These amounts are shown on the ratemaking income statement found in Attachment A, incorporated by reference herein;
- (2) The Auditing Unit conducted a full and complete audit of the Company's books and records using the 12-month period ending June 30, 2012, updated to October 31, 2012, as the basis for the revenue requirement determined above. The audit findings can be found in Attachment B, incorporated by reference herein;
- (3) The agreed upon net rate base is \$0. The development of this amount is shown on the rate base worksheet that is found in Attachment C, incorporated by reference herein. This amount is included in the audit work papers in the ultimate determination of the revenue requirement shown in (1) above;
- (4) Included in Attachment B-Schedule 8 is the agreed upon capital structure which includes 0% equity for the Company and a return on that equity of 0%;
- (5) The schedule of depreciation rates in Attachment D, incorporated by reference herein, includes the depreciation rates used by Staff in its revenue requirement analysis, and shall be the prescribed schedule of sewer plant depreciation rates for the Company;
- (6) To allow the Company the opportunity to collect the revenue requirement agreed to in (1) above, the rates as shown on Attachment E, incorporated by reference herein are just and reasonable rates that the Company will be allowed to charge its customers. The impact of these rates will be as shown on Attachment F, also attached and incorporated by reference herein;
- (7) For the purposes of implementing the agreements set out in this disposition agreement, the Company will file with the Commission proposed tariff revisions containing the rates, charges, and language set out in the example tariff sheet(s) attached as Attachment E. The proposed tariff revisions will bear an effective date of April 8, 2013;
- (8) The current PSC MO Number 1, 1st revised tariff sheet No. 5, will be cancelled and replaced by PSC MO Number 1, 2nd revised tariff sheet No. 5, which is included in the example tariff described above;

(9) Within thirty (30) days of the effective date of an order approving this Unanimous Disposition Agreement, the Company shall implement the recommendations contained in the Report of Water & Sewer Unit attached hereto as Attachment G and incorporated by reference herein, and provide proof of implementing the recommendation to the Manager of the Commission's Water & Sewer Unit:

- (a) The Company will send customers certified discontinuance letters thirty (30) days prior to discontinuance of service as required by Rule 7F of the Company's tariff;

(10) Within ninety (90) days of the effective date of an order approving this Unanimous Disposition Agreement, the Company shall implement the recommendations contained in the EMSU's Report of Customer Service & Business Operations Review attached hereto as Attachment I and incorporated by reference herein, and provide proof of implementing the recommendations to the Manager of the Commission's EMSU Unit:

- (a) The Company will develop and utilize time sheets to record work assignments and the time associated with each work assignment;

(11) Within ninety (90) days of the effective date of an order approving this Unanimous Disposition Agreement, the Company shall implement the recommendations contained in the Auditing Unit Recommendation Memorandum attached hereto as Attachment H and incorporated by reference herein and provide proof of implementing the recommendations to the Manager of the Commission's Auditing Unit:

- (a) The Company will develop Continuing Property Records (CPRs) for all of its Plant in Service and Contribution in Aid of Construction (CIAC) as the Company acquires new plant items; and
- (b) The Company will maintain three (3) separate general ledgers for its regulated water, regulated sewer and nonregulated rental businesses, respectively; and allocate 25% of all prudent administrative/overhead expenses each to their sewer and water regulated entities, so that 50% of Company administrative/overhead costs are assigned to the regulated operations in total and 50% assigned to the nonregulated operations;

(12) The Company shall mail its customers a final written notice of the rates and charges included in its proposed tariff revisions prior to or with its next billing cycle after issuance of the Commission order approving the terms of this Unanimous Disposition Agreement. The notice shall include a summary of the impact of the proposed rates on an average residential customer's bill. When the Company mails the notice to its customers, it shall also send a copy to the Staff Case Coordinator who will file a copy in this case;

- (13) Staff or Public Counsel may conduct follow-up reviews of the Company's operations to ensure that the Company has complied with the provisions of this Unanimous Disposition Agreement;
- (14) Staff or Public Counsel may file a formal complaint against the Company, if the Company does not comply with the provisions of this Unanimous Disposition Agreement;
- (15) The Company, Staff and Public Counsel agree that they have read the foregoing Unanimous Disposition Agreement; that facts stated therein are true and accurate to the best of the Company's, Staff's and Public Counsel's knowledge and belief; that the foregoing conditions accurately reflect the agreement reached between the Company, Staff and Public Counsel; and that the Company, Staff and Public Counsel freely and voluntarily enters into this Disposition Agreement; and
- (16) The above agreements satisfactorily resolve all issues identified by Staff, Public Counsel and the Company regarding the Company's Request, except as otherwise specifically stated herein.

ADDITIONAL MATTERS

Other than the specific conditions agreed upon and expressly set out herein, the terms of this Unanimous Disposition Agreement reflect compromises between Staff, Public Counsel and the Company. In arriving at the amount of the annual operating revenue increase specified herein, no party has agreed to any particular ratemaking principle.

Staff has completed a Summary of Case Events and has included that summary as Attachment J to this Unanimous Disposition Agreement.


The Company acknowledges that the Staff will be filing this Unanimous Disposition Agreement and the attachments hereto. The Company also acknowledges that Staff or Public Counsel may make other filings in this case.

Additionally, the Company agrees that subject to the rules governing practice before the Commission that Staff and Public Counsel shall have the right to provide whatever oral explanation the Commission may request regarding this Unanimous Disposition Agreement at any agenda meeting at which this case is noticed to be considered by the Commission. Subject to the rules governing practice before the Commission, Staff and Public Counsel will be available to answer Commission questions regarding this Unanimous Disposition Agreement. To the extent reasonably

practicable, Staff shall provide the Company with advance notice of any such agenda meeting so that they may have the opportunity to be present and/or represented at the meeting.

SIGNATURES


Agreement Signed and Dated:



J. Michael Otten
~~Partner~~ **MANAGER OF L.L.C.**
Seges Partners Mobile Home Park L.L.C.

2-15-13

Date



Christina L. Baker
Deputy Public Counsel
The Office of The Public Counsel

2-19-13

Date



James Busch
Manager
Water & Sewer Unit
Missouri Public Service Commission Staff

2-19-13

Date

List of Attachments

- Attachment A – Ratemaking Income Statement
- Attachment B – EMS Run – Staff Accounting Schedules
- Attachment C – Rate Base Worksheet
- Attachment D – Schedule of Depreciation Rates
- Attachment E – Example Tariff Sheet
- Attachment F – Residential Customer Bill Comparison
- Attachment G – Report of Water & Sewer
- Attachment H – Auditing Unit Recommendation Memorandum
- Attachment I – Report of Customer Service & Business Operations Review
- Attachment J – Summary of Case Events

Agreement Attachment A
Ratemaking Income Statement

SEGES PARTNERS MOBILE HOME PARK L.L.C.

Rate Making Income Statement-Sewer

Operating Revenues at Current Rates

1	Tariffed Rate Revenues *	\$	30,756
2	Other Operating Revenues *	\$	492
3	Total Operating Revenues	\$	31,248
4	* See "Revenues - Current Rates" for Details		

Cost of Service

Item	Amount
1 Operators Salary	\$ 2,080
2 Purchased Sewer Treatment	\$ 25,064
3 System Repairs & Maintenance	\$ 1,277
4 Postage Expense	\$ 78
5 Administration & General - Salaries	\$ 3,120
6 Telephone & Internet Expense	\$ 292
7 Rate Case Expense	\$ 133
8 Regulatory Commission Expense	\$ 1,840
9 Miscellaneous General Expenses	\$ -
10 Sub-Total Operating Expenses	\$ 33,884
11 Property Taxes	\$ -
12 MO Franchise Taxes	\$ -
13 Employer FICA Taxes	\$ 398
14 Federal Unemployment Taxes	\$ -
15 State Unemployment Taxes	\$ -
16 State & Federal Income Taxes	\$ -
17 Sub-Total Taxes	\$ 398
18 Depreciation Expense	\$ -
19 Interest Expense	\$ -
20 Amortization of Certificate Case	\$ 500
21 Sub-Total Depreciation/Interest/Amortization	\$ 500
22 Return on Rate Base	\$ -
23 Total Cost of Service	\$ 34,782
24 Overall Revenue Increase Needed	\$ 3,534

Agreement Attachment B

EMS Run

Exhibit No.:
Issue: Accounting Schedules
Witness: MO PSC Auditors
Sponsoring Party: MO PSC Staff
Case No: SR-2013-0112
Date Prepared: 12/13/2012



MISSOURI PUBLIC SERVICE COMMISSION
REGULATORY REVIEW DIVISION
UTILITY SERVICES
STAFF ACCOUNTING SCHEDULES

SEGES PARTNERS MOBILE HOME PARK
CASE NO. SR-2013-0112

Jefferson City, Missouri

December 2012

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Expense Schedule - Sewer

Line Number	A Account Number (Optional)	B Expense Description	C Company/ Test Year Amount	D Adjustment Number	E Adjustments	F Jurisdictional Allocation	G Adjusted Jurisdictional
1		OPERATIONS EXPENSES					
2		Operator/Supervisors Salary	\$0	S-2	\$2,080	100.00%	\$2,080
3		Electricity - Pumping Treatment	\$0			100.00%	\$0
4		Purchased Sewer Treatment	\$36,821	S-4	-\$11,757	100.00%	\$25,064
5		TOTAL OPERATIONS EXPENSE	\$36,821		-\$9,677		\$27,144
6		MAINTENANCE EXPENSES					
7		Outside Services Employed	\$0			100.00%	\$0
8		System Repairs and Maintenance	\$1,600	S-8	-\$323	100.00%	\$1,277
9		Supplies Expense	\$0			100.00%	\$0
10		TOTAL MAINTENANCE EXPENSE	\$1,600		-\$323		\$1,277
11		CUSTOMER ACCOUNT EXPENSE					
12		Accounting Fees	\$0			100.00%	\$0
13		Billing & Collections	\$0			100.00%	\$0
14		Office Supplies	\$0			100.00%	\$0
15		Postage Expense	\$0	S-15	\$78	100.00%	\$78
16		Uncollectible Accounts	\$0			100.00%	\$0
17		TOTAL CUSTOMER ACCOUNT EXPENSE	\$0		\$78		\$78
18		ADMINISTRATIVE & GENERAL EXPENSES					
19		Administration & General Salaries	\$0	S-19	\$3,120	100.00%	\$3,120
20		Management Fee	\$0			100.00%	\$0
21		Telephone & Pagers	\$292			100.00%	\$292
22		Office Utilities	\$0			100.00%	\$0
23		Property & Liability Insurance	\$0			100.00%	\$0
24		Rate Case Expense	\$0	S-24	\$133	100.00%	\$133
25		Other Misc. Expenses	\$0			100.00%	\$0
26		TOTAL ADMINISTRATIVE AND GENERAL	\$292		\$3,253		\$3,545
27		OTHER OPERATING EXPENSES					
28		MO DNR Fees	\$0			100.00%	\$0
29		PSC Assessment	\$1,983	S-29	-\$143	100.00%	\$1,840
30		Amortization Expense (Cost of Certificate Case)	\$500			100.00%	\$500
31		Depreciation	\$0	S-31	\$0	100.00%	\$0
32		TOTAL OTHER OPERATING EXPENSES	\$2,483		-\$143		\$2,340
33		TAXES OTHER THAN INCOME					
34		Real & Personal Property Taxes	\$0			100.00%	\$0
35		Payroll Taxes	\$0	S-35	\$398	100.00%	\$398
36		TOTAL TAXES OTHER THAN INCOME	\$0		\$398		\$398
37		TOTAL OPERATING EXPENSES	\$41,196		-\$6,414		\$34,782

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Expense Adjustment Schedule - Sewer

A Expense Adj Number	B Adjustment Description	C Account Number	D Adjustment Amount	E Total Adjustment
S-2	Operator/Supervisors Salary			\$2,080
	To annualize Jimmy Smith's salary		\$2,080	
S-4	Purchased Sewer Treatment			-\$11,757
	To Annualize Purchased Sewer Expense		-\$11,757	
S-8	System Repairs and Maintenance			-\$323
	To annualized maintenance expense		-\$323	
S-15	Postage Expense			\$78
	To annualize postage expense		\$78	
S-19	Administration & General Salaries			\$3,120
	To annualize Allison Schowengerdt's salary		\$3,120	
S-24	Rate Case Expense			\$133
	To normalize rate case expense		\$133	
S-29	PSC Assessment			-\$143
	To annualize PSC Assessment		-\$143	
S-31	Depreciation			\$0
	1. To Annualize Depreciation		\$0	
S-35	Payroll Taxes			\$398
	To annualize payroll taxes		\$398	
Total Expense Adjustments				-\$6,414

Seges Partners Mobile Home Park
Informal Rate Case
Tracking Number SR-2013-0112
Test Year Ending 6/30/2012
Expense Adjustment Schedule - Sewer

<u>A</u> Expense Adj Number	<u>B</u> Adjustment Description	<u>C</u> Account Number	<u>D</u> Adjustment Amount	<u>E</u> Total Adjustment
-----------------------------------	------------------------------------	-------------------------------	----------------------------------	---------------------------------

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Revenue Schedule - Sewer

Line Number	A Account Number (Optional)	B Revenue Description	C Company/ Test Year Amount	D Adjustment Number	E Jurisdictional Adjustments	F Jurisdictional Allocation	G Adjusted Jurisdictional
Rev-1		ANNUALIZED REVENUES					
Rev-2		Annualized Rate Revenues	\$0	Rev-2	\$30,756	100.00%	\$30,756
Rev-3		Miscellaneous Revenues	\$0	Rev-3	\$492	100.00%	\$492
Rev-4		TOTAL ANNUALIZED REVENUES	\$0		\$31,248		\$31,248

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Revenue Adjustment Schedule - Sewer

A Revenue Adj Number	B Adjustment Description	C Account Number	D Adjustment Amount	E Total Adjustment
Rev-2	Annualized Rate Revenues			\$30,756
	1. To Annualize Rate Revenues		\$30,756	
	2. Description		\$0	
	3. Description		\$0	
Rev-3	Miscellaneous Revenues			\$492
	1. To Annualize Miscellaneous Revenues		\$492	
	2. Description		\$0	
	Total Revenue Adjustments			\$31,248

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Revenue Summary Schedule - Sewer

Line Number	A Description	Residential 5/8"		Commercial 2"	
		B Amount	C Amount	D Amount	E Amount
1	<u>Customer Charge Revenues:</u>				
2	Customer Number	58		0	
3	Bills Per Year	12		0	
4	Customer Bills Per year	696		0	
5	Current Customer Charge	<u>\$27.53</u>		<u>\$0.00</u>	
6	Annualized Customer Charge Revenues		\$19,161		\$0
7	<u>Commodity Charge Revenues:</u>				
8	Total Gallons Sold	3,003,771		0	
9	Less: Base Gallons Included In Customer Charge	<u>0</u>		<u>0</u>	
10	Commodity Gallons	3,003,771		0	
11	Block 1, Commodity Gallons per Block	3,003,771		0	
12	Block 1, Number of Commodity Gallons per Unit	<u>1,000</u>		<u>0</u>	
13	Block 1, Commodity Billing Units	3,003.77		0.00	
14	Block 1, Existing Commodity Charge	<u>\$3.86</u>		<u>\$0.00</u>	
15	Block 1, Annualized Commodity Charge Rev.		\$11,595		\$0
16	Total Annualized Sewer Rate Revenues		<u>\$30,756</u>		<u>\$0</u>

Commodity Billing Units are based on the number of commodity gallons applicable to each block, divided by the tariff usage rate gallons (e.g. for tariff rate of \$2.50 per 1,000 gallons of usage, the commodity gallons for that rate would be divided by 1,000 to arrive at the number of commodity billing units).

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Revenue Summary Schedule - Sewer

Line Number	A Description	Total	
		E Amount	G Amount
1	<u>Customer Charge Revenues:</u>		
2	Customer Number	58	
3	Bills Per Year		
4	Customer Bills Per year	696	
5	Current Customer Charge		
6	Annualized Customer Charge Revenues		\$19,161
7	<u>Commodity Charge Revenues:</u>		
8	Total Gallons Sold	3,003,771	
9	Less: Base Gallons Included In Customer Charge	0	
10	Commodity Gallons	3,003,771	
11	Block 1, Commodity Gallons per Block		
12	Block 1, Number of Commodity Gallons per Unit		
13	Block 1, Commodity Billing Units		
14	Block 1, Existing Commodity Charge		
15	Block 1, Annualized Commodity Charge Rev.		\$11,595
16	Total Annualized Sewer Rate Revenues		\$30,756

Commodity Billing Units are based on the number of commodity gallons applicable to each block, divided by the tariff usage rate gallons (e.g. for tariff rate of \$2.50 per 1,000 gallons of usage, the commodity gallons for that rate would be divided by 1,000 to arrive at the number of commodity billing units.

Seges Partners Mobile Home Park
Informal Rate Case
Tracking Number SR-2013-0112
Test Year Ending 6/30/2012
Miscellaneous Revenues Feeder - Sewer

Line Number	A Description	B Amount
4	Total Miscellaneous Revenues	<u>\$492</u>

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Rate Design Schedule - Sewer

Line Number	A Description	B Account Number (Optional)	C Staff Annualized	D Customer Charge	E Commodity	E Percentage Rate
Rev-1	ANNUALIZED REVENUES					
Rev-2	Annualized Rate Revenues		(1) \$30,756			
Rev-3	Miscellaneous Revenues		(1) \$492			
Rev-4	TOTAL ANNUALIZED REVENUES		<u>\$31,248</u>			
1	OPERATIONS EXPENSES		(2)			
2	Operator/Supervisors Salary		\$2,080	\$0	\$2,080	0.00%
3	Electricity - Pumping Treatment		\$0	\$0	\$0	0.00%
4	Purchased Sewer Treatment		\$25,064	\$0	\$25,064	0.00%
5	TOTAL OPERATIONS EXPENSE		<u>\$27,144</u>	\$0	\$27,144	
6	MAINTENANCE EXPENSES					
7	Outside Services Employed		\$0	\$0	\$0	0.00%
8	System Repairs and Maintenance		\$1,277	\$0	\$1,277	0.00%
9	Supplies Expense		\$0	\$0	\$0	0.00%
10	TOTAL MAINTENANCE EXPENSE		<u>\$1,277</u>	\$0	\$1,277	
11	CUSTOMER ACCOUNT EXPENSE					
12	Accounting Fees		\$0	\$0	\$0	0.00%
13	Billing & Collections		\$0	\$0	\$0	0.00%
14	Office Supplies		\$0	\$0	\$0	0.00%
15	Postage Expense		\$78	\$0	\$78	0.00%
16	Uncollectible Accounts		\$0	\$0	\$0	0.00%
17	TOTAL CUSTOMER ACCOUNT EXPENSE		<u>\$78</u>	\$0	\$78	
18	ADMINISTRATIVE & GENERAL EXPENSES					
19	Administration & General Salaries		\$3,120	\$0	\$3,120	0.00%
20	Management Fee		\$0	\$0	\$0	0.00%
21	Telephone & Pagers		\$292	\$0	\$292	0.00%
22	Office Utilities		\$0	\$0	\$0	0.00%
23	Property & Liability Insurance		\$0	\$0	\$0	0.00%
24	Rate Case Expense		\$133	\$0	\$133	0.00%
25	Other Misc. Expenses		\$0	\$0	\$0	0.00%
26	TOTAL ADMINISTRATIVE AND GENERAL		<u>\$3,545</u>	\$0	\$3,545	
27	OTHER OPERATING EXPENSES					
28	MO DNR Fees		\$0	\$0	\$0	0.00%
29	PSC Assessment		\$1,840	\$0	\$1,840	0.00%
30	Amortization Expense (Cost of Certificate Case)		\$500	\$0	\$500	0.00%
31	Depreciation		\$0	\$0	\$0	0.00%
32	TOTAL OTHER OPERATING EXPENSES		<u>\$2,340</u>	\$0	\$2,340	
33	TAXES OTHER THAN INCOME					
34	Real & Personal Property Taxes		\$0	\$0	\$0	0.00%
35	Payroll Taxes		\$398	\$0	\$398	0.00%
36	TOTAL TAXES OTHER THAN INCOME		<u>\$398</u>	\$0	\$398	
37	TOTAL OPERATING EXPENSES		<u>\$34,782</u>	\$0	\$34,782	
38	Interest Expense		(3) \$0	\$0	\$0	0.00%
39	Return on Equity		(3) \$0	\$0	\$0	0.00%
40	Income Taxes		(3) \$0	\$0	\$0	0.00%
41	TOTAL INTEREST RETURN & TAXES		<u>\$0</u>	\$0	\$0	
42	TOTAL COST OF SERVICE		\$34,782	\$0	\$34,782	
43	Less: Miscellaneous Revenues		<u>\$492</u>	\$0	\$492	0.00%

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Rate Design Schedule - Sewer

Line Number	A Description	B Account Number (Optional)	C Staff Annualized	D Customer Charge	E Commodity	F Percentage Rate
44	COST TO RECOVER IN RATES		\$34,290	\$0	\$34,290	
45	INCREMENTAL INCREASE IN RATE REVENUES		<u>\$3,534</u>			
46	PERCENTAGE OF INCREASE		<u>11.31%</u>			
47	REQUESTED INCREASE IN REVENUES		\$3,326			

- (1) From Revenue Schedule
- (2) From Expense Schedule
- (3) From PreTax Rate of Return Schedule, Rate Base & Return Schedule

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Rate of Return Including Income Tax - Sewer

	A	B	formulas
1 State Income Tax Rate Statutory / Effective	6.25% (2)	6.25%	$(1 - (B2 \times .5)) \times A1$
2 Federal Income Tax Rate Statutory / Effective	0.00% (1) & (2)	0.00%	$(1 - B1) \times A2$
3 Composite Effective Income Tax Rate		6.25%	$B1 + B2$
4 Equity Tax Factor		1.0667	$1 / (1 - B3)$
5 Recommended Weighted Rate of Return on Equity - Common and Preferred		0.00%	From Capital Structure Schedule
6 Weighted Rate of Return on Equity Including Income Tax		0.00%	$B4 \times B5$
7 Recommended Weighted Rate of Return on Debt - Long-Term and Short-Term		0.00%	From Capital Structure Schedule
8 Total Weighted Rate of Return Including Income Tax		0.00%	$B6 + B7$

To Rate Base Schedule

(1) If Sub-Chapter S Corporation, Enter Y:

Equity Income Required \$0
 & Preliminary Federal Tax

Tax Rate Table

Net Income Range					
Start	End	Tax Rate	Amount in Range	Tax on Range	
\$0	\$50,000	15.00%	\$0	\$0	\$0
\$50,001	\$75,000	25.00%	\$0	\$0	\$0
\$75,001	\$100,000	34.00%	\$0	\$0	\$0
\$100,001	\$335,000	39.00%	\$0	\$0	\$0
\$335,001	\$9,999,999,999	34.00%	\$0	\$0	\$0
				\$0	\$0
				Consolidated Tax Rate:	
				Average Tax Rate: 0	

Seges Partners Mobile Home Park
Informal Rate Case
Tracking Number SR-2013-0112
Test Year Ending 6/30/2012
Rate Base Required Return on Investment Schedule - Sewer

Line Number	A Rate Base Description	B Dollar Amount
1	Plant In Service	\$31,725 From Plant Schedule
2	Less Accumulated Depreciation Reserve	<u>\$0</u> From Depreciation Reserve Schedule
3	Net Plant In Service	\$31,725
4	Other Rate Base Items:	\$0
	Contribution of Aid of Construction	-\$31,725
	CIAC Depreciation	\$0
5	Total Rate Base	<u>\$0</u>
6	Total Weighted Rate of Return Including Income Tax	<u>0.00%</u> From PreTax Return & Taxes Schedule
7	Required Return & Income Tax	<u><u>\$0</u></u>

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Capital Structure Schedule - Sewer

A	B	C	D	E	
Line Number	Description	Dollar Amount	Percentage of Total Capital Structure	Embedded Cost of Capital	Weighted Cost of Capital
1	Common Stock	\$0	0.00%	0.00%	0.000%
2	Other Security-Non Tax Deductible	\$0	0.00%	0.00%	0.000%
3	Preferred Stock	\$0	0.00%	0.00%	0.000%
4	Long Term Debt	\$0	0.00%	0.00%	0.000%
5	Short Term Debt	\$0	0.00%	0.00%	0.000%
6	Other Security-Tax Deductible	\$0	0.00%	0.00%	0.000%
7	TOTAL CAPITALIZATION	<u>\$0</u>	<u>0.00%</u>		<u>0.000%</u>

To PreTax Return Rate Schedule

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Plant In Service - Sewer

Line Number	A Account # (Optional)	B Plant Account Description	C Total Plant	D Adjustment Number	E Adjustments	F Jurisdictional Allocation	G Adjusted Jurisdictional
1		INTANGIBLE PLANT					
2	301.000	Organization	\$0			100.00%	\$0
3	302.000	Franchises	\$0			100.00%	\$0
4	303.000	Miscellaneous Intangible Plant	\$0			100.00%	\$0
5		TOTAL INTANGIBLE PLANT	\$0		\$0		\$0
6		SOURCE OF SUPPLY PLANT					
7	310.000	Land & Land Rights	\$0			100.00%	\$0
8	311.000	Structures & Improvements	\$0			100.00%	\$0
9		TOTAL SOURCE OF SUPPLY PLANT	\$0		\$0		\$0
10		COLLECTION PLANT					
11	352.100	Collection Sewer Pipes	\$31,725			100.00%	\$31,725
12	352.200	Collection Sewers - Gravity	\$0			100.00%	\$0
13	353.000	Other Collection Plant Facilities	\$0			100.00%	\$0
14	354.000	Services to Customers	\$0			100.00%	\$0
15	355.000	Flow Measuring Devices	\$0			100.00%	\$0
16		TOTAL COLLECTION PLANT	\$31,725		\$0		\$31,725
17		PUMPING PLANT					
18	362.000	Receiving Wells and Pump Pits	\$0			100.00%	\$0
19	363.000	Pumping Equipment (Elec., Diesel, other)	\$0			100.00%	\$0
20		TOTAL PUMPING PLANT	\$0		\$0		\$0
21		TREATMENT & DISPOSAL PLANT					
22	372.000	Oxidation Lagoon	\$0			100.00%	\$0
23	373.000	Treatment and Disposal Equipment	\$0			100.00%	\$0
24	374.000	Plant Sewers	\$0			100.00%	\$0
25	375.000	Outfall Sewer Lines	\$0			100.00%	\$0
26	376.000	Other Treatment & Disposal Plant Equip.	\$0			100.00%	\$0
27		TOTAL TREATMENT & DISPOSAL PLANT	\$0		\$0		\$0
28		GENERAL PLANT					
29	391.000	Office Furniture & Equipment	\$0			100.00%	\$0
30		Office Computer Equipment	\$0			100.00%	\$0
31	392.000	Transportation Equipment	\$0			100.00%	\$0
32	393.000	Other General Equipment, includes stores, tools shop & garage, lab, power operated, communication, and other tangible equipment.	\$0			100.00%	\$0
33		TOTAL GENERAL PLANT	\$0		\$0		\$0
34		TOTAL PLANT IN SERVICE	\$31,725		\$0		\$31,725

To Rate Base & Depreciation Schedules

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Schedule of Adjustments for Plant in Service - Sewer

A	B	C	D	E
Plant Adjustment Number	Plant In Service Adjustment Description	Account Number	Adjustment Amount	Total Adjustment
Total Plant Adjustments				\$0

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Accumulated Depreciation Reserve - Sewer

Line Number	A Account Number	B Depreciation Reserve Description	C Total Reserve	D Adjustment Number	E Adjustments	F Jurisdictional Allocation	G Adjusted Jurisdictional
1		INTANGIBLE PLANT					
2	301.000	Organization	\$0			100.00%	\$0
3	302.000	Franchises	\$0			100.00%	\$0
4	303.000	Miscellaneous Intangible Plant	\$0			100.00%	\$0
5		TOTAL INTANGIBLE PLANT	\$0		\$0		\$0
6		SOURCE OF SUPPLY PLANT					
7	310.000	Land & Land Rights	\$0			100.00%	\$0
8	311.000	Structures & Improvements	\$0			100.00%	\$0
9		TOTAL SOURCE OF SUPPLY PLANT	\$0		\$0		\$0
10		COLLECTION PLANT					
11	352.100	Collection Sewer Pipes	\$0			100.00%	\$0
12	352.200	Collection Sewers - Gravity	\$0			100.00%	\$0
13	353.000	Other Collection Plant Facilities	\$0			100.00%	\$0
14	354.000	Services to Customers	\$0			100.00%	\$0
15	355.000	Flow Measuring Devices	\$0			100.00%	\$0
16		TOTAL COLLECTION PLANT	\$0		\$0		\$0
17		PUMPING PLANT					
18	362.000	Receiving Wells and Pump Pits	\$0			100.00%	\$0
19	363.000	Pumping Equipment (Elec., Diesel, other)	\$0			100.00%	\$0
20		TOTAL PUMPING PLANT	\$0		\$0		\$0
21		TREATMENT & DISPOSAL PLANT					
22	372.000	Oxidation Lagoon	\$0			100.00%	\$0
23	373.000	Treatment and Disposal Equipment	\$0			100.00%	\$0
24	374.000	Plant Sewers	\$0			100.00%	\$0
25	375.000	Outfall Sewer Lines	\$0			100.00%	\$0
26	376.000	Other Treatment & Disposal Plant Equip.	\$0			100.00%	\$0
27		TOTAL TREATMENT & DISPOSAL PLANT	\$0		\$0		\$0
28		GENERAL PLANT					
29	391.000	Office Furniture & Equipment	\$0			100.00%	\$0
30		Office Computer Equipment	\$0			100.00%	\$0
31	392.000	Transportation Equipment	\$0			100.00%	\$0
32	393.000	Other General Equipment, includes stores, tools shop & garage, lab, power operated, communication, and other tangible equipment.	\$0			100.00%	\$0
33		TOTAL GENERAL PLANT	\$0		\$0		\$0
34		TOTAL DEPRECIATION RESERVE	\$0		\$0		\$0

To Rate Base Schedule

Seges Partners Mobile Home Park

Informal Rate Case

Tracking Number SR-2013-0112

Test Year Ending 6/30/2012

Schedule of Adjustments for Accumulated Depreciation Reserve - Sewer

<u>A</u> Reserve Adjustment Number	<u>B</u> Accumulated Depreciation Reserve Adjustments Description	<u>C</u> Account Number	<u>D</u> Adjustment Amount	<u>E</u> Total Adjustment Amount
---	---	-------------------------------	----------------------------------	---

Total Reserve Adjustments

\$0

Seges Partners Mobile Home Park
 Informal Rate Case
 Tracking Number SR-2013-0112
 Test Year Ending 6/30/2012
 Depreciation Expense - Sewer

Line Number	A Account Number	B Plant Account Description	C Adjusted Jurisdictional	D Depreciation Rate	E Depreciation Expense
1		INTANGIBLE PLANT			
2	301.000	Organization	\$0	0.00%	\$0
3	302.000	Franchises	\$0	0.00%	\$0
4	303.000	Miscellaneous Intangible Plant	\$0	0.00%	\$0
5		TOTAL INTANGIBLE PLANT	<u>\$0</u>		<u>\$0</u>
6		SOURCE OF SUPPLY PLANT			
7	310.000	Land & Land Rights	\$0	0.00%	\$0
8	311.000	Structures & Improvements	\$0	0.00%	\$0
9		TOTAL SOURCE OF SUPPLY PLANT	<u>\$0</u>		<u>\$0</u>
10		COLLECTION PLANT			
11	352.100	Collection Sewer Pipes	\$31,725	0.00%	\$0
12	352.200	Collection Sewers - Gravity	\$0	0.00%	\$0
13	353.000	Other Collection Plant Facilities	\$0	0.00%	\$0
14	354.000	Services to Customers	\$0	0.00%	\$0
15	355.000	Flow Measuring Devices	\$0	0.00%	\$0
16		TOTAL COLLECTION PLANT	<u>\$31,725</u>		<u>\$0</u>
17		PUMPING PLANT			
18	362.000	Receiving Wells and Pump Pits	\$0	0.00%	\$0
19	363.000	Pumping Equipment (Elec., Diesel, other)	\$0	0.00%	\$0
20		TOTAL PUMPING PLANT	<u>\$0</u>		<u>\$0</u>
21		TREATMENT & DISPOSAL PLANT			
22	372.000	Oxidation Lagoon	\$0	0.00%	\$0
23	373.000	Treatment and Disposal Equipment	\$0	0.00%	\$0
24	374.000	Plant Sewers	\$0	0.00%	\$0
25	375.000	Outfall Sewer Lines	\$0	0.00%	\$0
26	376.000	Other Treatment & Disposal Plant Equip.	\$0	0.00%	\$0
27		TOTAL TREATMENT & DISPOSAL PLANT	<u>\$0</u>		<u>\$0</u>
28		GENERAL PLANT			
29	391.000	Office Furniture & Equipment	\$0	0.00%	\$0
30		Office Computer Equipment	\$0	0.00%	\$0
31	392.000	Transportation Equipment	\$0	0.00%	\$0
32	393.000	Other General Equipment, includes stores, tools shop & garage, lab, power operated, communication, and other tangible equipment.	\$0	0.00%	\$0
33		TOTAL GENERAL PLANT	<u>\$0</u>		<u>\$0</u>
34		Total Depreciation	<u>\$31,725</u>		<u>\$0</u>

Agreement Attachment C

Rate Base Worksheet

Rate Base Worksheet
Seges Partners Mobile Home Park L.L.C.
Case No. SR-2013-0112
Rate Base as of October 31, 2012

Plant in Service	\$ 31,725	
Less: Accumulated Depreciation Reserve	<u>\$ -</u>	
Net Plant in Service		\$ 31,725
Other Rate Base Items:		
Customer Deposits	\$ -	
Materials & Supplies	\$ -	
Prepaid Insurance	\$ -	
Customer Advances for Construction	\$ (31,725)	
CIAC Depreciation Offset	\$ -	
Total Other Rate Base Items		<u>\$ (31,725)</u>
Total Rate Base		<u><u>\$ 0</u></u>

Agreement Attachment D

Schedule of Depreciation Rates

Seges Partners Mobile Home Park, L.L.C. - Attachment D

SR-2013-0112 - Class D Sewer

Schedule of Depreciation Rates

<u>ACCOUNT NUMBER</u>	<u>ACCOUNT DESCRIPTION</u>	<u>DEPRECIATION RATE</u>	<u>AVERAGE SERVICE LIFE (YEARS)</u>	<u>NET SALVAGE</u>
352.2	Collection Sewers (Gravity)	2.0%	50	0%
354	Services	2.0%	50	0%

Agreement Attachment E

Example Tariff Sheets

Seges Partners Mobile Home Park, LLC
 Name of Issuing Company

For: Seges Partners Mobile Home Park
 Certificated Service Area

Rules Governing Rendering of Sewer Service	
<u>Schedule of Rates</u>	
<u>Monthly Minimum Service Charge:</u>	
\$30.69 regardless of water usage	+
<u>Monthly Commodity Charge:</u>	
\$4.30 for each 1,000 gallons of metered water usage	+
Taxes: Any applicable Federal, State or local taxes computed on billing basis shall be added as separate items in rendering each bill.	
Sewer bills will be prepared and distributed on a monthly billing cycle and will be rendered net, bearing the last date on which payment is due, all in accordance with Rule 9 hereafter.	
<p>* Indicates new rate or text + Indicates change</p>	

Issue Date: February 21, 2013
 Month/Day/Year

DATE EFFECTIVE

April 8, 2013
 Month/Day/Year

Issued By: J. Michael Otten, Partner
 Name & Title of Issuing Officer

1435 Thompson Blvd., Suite B Sedalia, MO 65301
 Company Mailing Address

Agreement Attachment F

Billing Comparison Worksheet

SEGES PARTNERS MOBILE HOME PARK L.L.C.

Residential Customer Bill Comparison-Sewer

Rates for 5/8" Meter

<u>Current Base</u>	<u>Proposed Base</u>	<u>Current</u>	<u>Proposed</u>
<u>Customer Charge</u>	<u>Customer Charge</u>	<u>Usage Rate</u>	<u>Usage Rate</u>
\$27.53	\$30.69	\$3.86	\$4.30

current service charge is monthly charge

MONTHLY BILL COMPARISON

Current Rates

Customer Charge	\$ 27.53
Usage Charge	\$ 23.16
Total Bill	\$ 50.69

Proposed Rates

Customer Charge	\$ 30.69
Usage Charge	\$ 25.82
Total Bill	\$ 56.51

INCREASES

Customer Charge

\$ Increase	\$3.16
% Increase	11.49%

Usage Charge

\$ Increase	\$2.66
% Increase	11.49%

Total Bill

\$ Increase	\$5.82
% Increase	11.49%

Agreement Attachment G

Water & Sewer Unit Memorandum

REPORT OF WATER AND SEWER UNIT
FIELD OPERATIONS AND TARIFF REVIEW

Water and Sewer Unit
File No. SR-2013-0112
Seges Partners Mobile Home Park, L.L.C.
Jerry Scheible/James Russo

Introduction

This Report was prepared jointly by Missouri Public Service Commission Staff (Staff) members Jerry Scheible and James Russo, who work in the Water and Sewer Unit. The Staff member responsible for each section is denoted at the end of each section.

Seges Partners Mobile Home Park, L.L.C. (Seges or Company) received a certificate of public convenience and necessity to provide water service, and a certificate of public convenience and necessity to provide sewer service, from the Missouri Public Service Commission (Commission) in August 2009, in consolidated Case WA-2008-0403.

Seges last filed a Small Company Rate Case, SR-2011-0133, in 2011, for the sewer utility only. A Unanimous Disposition Agreement providing for an increase of \$8,627 in Seges' annual operating revenues for its sewer system was approved in the case. The rates reflecting the increase became effective April 1, 2011.

The Company provides water and sewer service to approximately 60 residential customers in a mobile home park in the city limits of the City of Holts Summit, Missouri in Callaway County.

On September 19, 2012, the Company filed a *Request for Increase in Annual Sewer System Operating Revenues* with the Commission seeking a \$3,326.40 rate increase. As in the 2011 filing, Seges filed this rate case for the sewer utility only. Staff performed a site-visit to the Seges facilities on November 16, 2012. (Scheible)

Facilities

Seges' sewer utility facilities consist of a collection system only, as sewer treatment service is purchased from the City of Holts Summit. Seges does not own or operate any treatment facility and is therefore not required to hold any sewer/wastewater permit from the Missouri Department of Natural Resources (MDNR). MDNR also does not require a certified operator to oversee Seges' sewer facilities. There are currently no known MDNR violations.

The collection system consists of a total of approximately 3,900 feet of piping, predominately ten- inch diameter PVC, and fourteen (14) manholes. The system is entirely gravity with no mechanical lift-stations and was originally installed in the 1970's and 1980's. (Scheible)

Operations

The Park Manager resides in the mobile home park and is responsible for sewer system operations. He is also responsible for the water system and related meter readings and any other mobile home park maintenance and repair issues. The current Park Manager holds DS 1 level operator certification from the MDNR for the drinking water distribution system.

Operations consist primarily of maintenance of the collection system, inspecting the lines and manholes for leaks and potential blockages, and clearing blockages with a Company-owned line-jetting machine. Minor repairs are performed by the Park Manager with hand tools or rented equipment. Major repairs may be performed by an outside contractor. (Scheible)

Public Comments

The Company sent a letter to its customers, notifying them of the rate case, on October 19, 2012. Staff received zero public comments from customers in response. (Scheible)

Tariff Review

Sege's current tariff became effective December 31, 2009, with PSC MO Number 1, First Revised Sheet No. 5, titled Schedule of Rates, effective April 1, 2011. A new rate schedule will be developed to reflect the new rates the customers will be required to pay based on the Company's cost of service. Staff is not proposing any other changes to the current tariff at this time.

Although the Company provides notice of discontinuance, the Company is currently not sending thirty (30) day certified notice of service discontinuance letters (discontinuance letters) to sewer customers with a pending disconnection of service for nonpayment. The Company is also not sending a copy of the sewer discontinuance letter to the Commission's Water and Sewer Unit. This is required by Rule 7 F of the Company's tariff. (Russo)

Rate Design

Staff also reviewed the current rate design in its investigation. The current rate design is a monthly service charge and a monthly commodity charge per 1,000 gallons of water usage. Staff recommends that this current rate design remain in place. (Russo)

Recommendations

Staff of the Water and Sewer Unit recommends the following:

- 1) The Company will send customers certified discontinuance letters thirty (30) days prior to discontinuance of service and provide the Manager of the Commission's Water and Sewer Unit a copy of the discontinuance letter as required by Rule 7 F of the Company's tariff.

Agreement Attachment H

Auditing Unit Recommendation Memorandum

AUDITING DEPARTMENT RECOMMENDATION MEMORANDUM

FROM: Jermaine Green

TO: James Russo, Case Coordinator
Water and Sewer Department

CC: Kim Bolin
Mark Oligschlaeger
Rachel Lewis

SUBJECT: **Auditing Unit's Findings and Recommended Cost of Service
Seges Partners Mobile Home Park L.L.C.
Case No. SR-2013-0112**

DATE: February 6, 2013

Seges Partners Mobile Home Park L.L.C. (Seges or Company) is located in Holts Summit, Missouri and Seges is one of the seven entities owned by M&C Management L.L.C. ("M&C") that is owned by a Managing Partner. Seges Mobile Home Park L.L.C is involved in both regulated and non-regulated operations. Seges Water and Sewer represent the regulated entity of the L.L.C and the Mobile Home Park rental represents the non-regulated entity. Presently the Company provides water and sewer service to an average of 58 customers. Seges' last sewer rate increase of \$8,627 became effective April 1, 2011. Seges filed for a rate increase on September 19, 2012 under the Commission's Small Company Rate Procedure. Their request seeks an annual revenue increase of \$3,326.40 for sewer service.

The Auditing Staff (Staff) performed an analysis of Seges' financial documents and records, based on a test year of the twelve months ending June 30, 2012, and updated for known and measurable changes through October 31, 2012. Staff's analysis shows that the current rates for the Company's sewer operations are under recovering the cost of service and therefore Staff recommends an increase of \$3,534. Attached to this

Memorandum are Staff's workpapers related to its review of Seges' operations. The following is a discussion of Staff's findings in this case.

RATE BASE:

Staff did not sponsor plant-in-service workpapers in this case. During Seges' certificate case, Case No. WA-2008-0403, it was determined that all of the plant-in-service (\$31,725) for Seges was provided for through contributions in aid of construction (CIAC). Seges has not added any new plant since the Company's certification case and do not maintain any Continuing Property Records (CPRs). As a result, Staff has not allowed any recovery of plant-in-service costs in this case.

REVENUES:

Seges' current sewer customer service charge is \$27.53 per month. The metered tariff rate for sewer is \$3.86 per 1,000 gallons of water usage in addition to the service charge. The Staff performed a three (3) year analysis to determine a normalized number of customers and a normalized usage per customer and used this information to determine the Company's annualized revenues.

PURCHASED SEWER COSTS

Seges currently purchases its sewer services from the City of Holts Summit, Missouri. At the end of the each month, Seges provided the mobile home park residents an itemized bill which lists fees for sewer service, the mobile home pad rent, and water service. Staff used the City of Holts Summit's sewer rate that becomes effective on April 1, 2013, which is \$20.81 per month for each pad connection and \$3.45 per 1000 gallons for the usage. Staff applied its normalized customer numbers and usage to the new City of Holts Summit sewer rate to determine Seges normalized purchased sewer costs. Staff's analysis used only the 58 customers/pad rentals that are currently occupied. In the past, Seges paid the City of Holts Summit a connection fee for an additional 55 pads that were not occupied by residents. As of September 29, 2012, Seges and the City of Holt Summits have entered into agreement to disconnect these unoccupied pads that were costing the

Company an additional \$11,757 annually. The monthly costs for these vacant pads were paid by the mobile home park, not the sewer customers within the mobile home park.

PAYROLL & PAYROLL TAXES:

Seges currently has two employees; they include a Mobile Home Park Manager and an Office Manager. The Park Manager is responsible for the mobile home park maintenance and repairs, water and sewer system maintenance and meter reading. He holds a drinking water distribution license (DS 1) from the Missouri Department of Natural Resources, (DNR). The Office Manager is responsible for all the administrative tasks, including accounts payable, accounts receivable, billing and collections and general financial statement preparation. Staff normalized the payroll for the Park Manager and the Office Manager positions based on four (4) hours a week for \$10 and \$15 per hour, respectively. Since the last rate case, the Company has implemented a formal process of tracking its employee's time between the different business entities; however, the data was too voluminous to quantify the actual hours and some timesheets did not record the amount of time, only the activity. However, after meeting with the Company's employees and discussing their daily routine and responsibilities as it relates to the water and sewer utilities, Staff found it reasonable to allow four (4) hours per week for each employee. The salary level that Staff included for both employees in this case is supported by the Missouri Research and Information Center (MERIC) under the job categories for bookkeeping (Office Manager) and waste water operator (Park Manager) in the central Missouri area.

MANAGEMENT FEE

Seges charges a management fee of five percent (5%) of total revenue generated by the water and sewer utilities and also their rental business. This management fee is used to pay for total company employee salaries and other miscellaneous expenses. These expenses (employee salaries and miscellaneous expense) as it relates to sewer utility were individually audited and adjusted by Staff and are already included in the cost of service.

Therefore, Staff did not apply the 5% management fee factor to Staff's annualized revenues to determine an annualized management fee expense.

POSTAGE

Customers are sent one bill each month which charges for sewer service, mobile home pad rent and water service. Staff used an allocation percentage in order to allocate these costs. Staff found it prudent to allocate fifty percent (50%) of all costs to the mobile home park rental business and twenty-five percent (25%) to the water utility. The remaining twenty five percent (25%) is allocated to the sewer utility. This ratio was then applied to the annualized postage expense to determine an annualized postage expense.

TELEPHONE EXPENSE

Seges currently utilizes the services of three (3) telecommunication companies, all of which serve the mobile home park, the water utility and sewer utility. The Park Manager has a cellular phone with AT&T. There is a fax line through Centurylink at the mobile home park's office. The Office Manager in Sedalia, Missouri has a long distance line through GTC Telecom. These telephone charges are all billed to Seges Partners Mobile Home Park L.L.C. Staff used the same ratio to determine how much telephone expense to allocate to each entity as it did with the postage expense described above. Staff allocated twenty-five percent (25%) of total telephone expense to the sewer utility, after normalizing the total telephone expense over an 18-month period.

MAINTENANCE EXPENSE

For any major maintenance to the pipes and drainage equipment, Seges currently employs the services of Roto-Rooter out of Columbia, Missouri. Using an 18-month average, Staff reviewed the General Ledger entries and invoice from Roto-Rooter and calculated an annualized amount for this expense. Staff's annualized amount for maintenance expense is \$1,277.00

PSC ASSESSMENT AND RATE CASE EXPENSE

The Staff included \$1,840.19 for the Company's current 2013 PSC Assessment and a normalized level of rate case expense of \$133 in its cost of service. Based upon information provided to the Staff from Company in December 2012, Staff included a rate case expense of \$266 normalized over a two (2) year period.

STAFF RECOMMENDS:

The Auditing Staff recommends that the Company should fully comply with the following recommendations within ninety (90) days of the effective date of the Commission Order for SR-2013-0112:

1. Seges Partners Mobile Home Park L.L.C shall develop Continuing Property Records (CPRs) for all of its Plant in Service and CIAC as the Company acquires new plant items.
2. The Company will maintain three (3) separate general ledgers for its regulated water, regulated sewer and nonregulated rental businesses, respectively; and allocate 25% of all prudent administrative/overhead expenses each to their sewer and water regulated entities, so that 50% of Company administrative/overhead costs are assigned to the regulated operations in total and 50% assigned to the nonregulated operations.

Agreement Attachment I

EMSU Report

REPORT OF CUSTOMER SERVICE AND BUSINESS OPERATIONS REVIEW

Engineering and Management Services Unit

Small Company Rate Increase Request

File No. SR-2013-0112

Seges Partners Mobile Home Park L.L.C.

Tammy Vieth and Debbie Bernsen

The Engineering and Management Services Unit (EMSU) staff of the Missouri Public Service Commission (“Commission”) initiated an informal review of the customer service and business processes, procedures, and practices of Seges Partners Mobile Home Park L.L.C. (“Seges” or “Company”) in Sedalia, Missouri, in November 2012. The review was performed in response to the Company’s request for a rate increase in File No. SR-2013-0112, which was filed September 19, 2012. The Company is requesting an increase of \$3,326.40 in its annual sewer system operating revenues. This request represents an increase of approximately 13% to the Company’s annual sewer system operating revenues.

The EMSU staff examined the Company’s tariffs, annual reports, Commission complaint and inquiry records, and other documentation related to the Company's customer service and business operations. In preparation of this report, the EMSU staff submitted data requests to the Company on October 2, 2012, and conducted interviews with Company personnel located in Sedalia, Missouri, on November 1, 2012 and with Company personnel located in Holts Summit, Missouri on December 3, 2012. The EMSU staff’s review of the Company resulted in the following recommendation for Company management.

THE EMSU STAFF RECOMMENDS THAT COMPANY MANAGEMENT:

Develop and utilize time sheets to record work assignments and the time associated with each work assignment. This recommendation should be completed within ninety (90) days of the effective date of any Commission order issued in this case, SR-2013-0112.

The purpose of the EMSU is to promote and encourage efficient and effective utility management. This purpose contributes to the Commission’s overall mission to ensure that customers receive safe and adequate utility service at reasonable rates while providing utilities the opportunity to earn a fair return on their investment.

The objectives of this review were to analyze and document the management control processes, procedures, and practices used by the Company to ensure that its customers' service needs are met and to make recommendations, where appropriate, by which the Company may improve the quality of services provided to its customers. The findings of this review will also provide the Commission with information regarding the Company's customer service and business operations.

The scope of this review focused on processes, procedures, and practices related to:

- Customer Billing
- Payment Remittance
- Credit and Collections
- Complaints and Inquiries
- Customer Communication
- Records and Documentation Retention

History

The EMSU staff previously performed a customer service review of the Company in December 2010. This review was performed in conjunction with the small company rate request submitted by the Company and assigned Case No. SR-2011-0133. The review resulted in a written report and included recommendations for improvement in the areas of time recording and maintaining vehicle logs. The Unanimous Agreement Regarding Disposition that was approved in the prior case, addressed specific timeframes for the completion of each of the recommendations suggested in the report. The EMSU staff assisted the Company to ensure that these recommendations were addressed. The actions taken by the Company were considered appropriate for meeting the intent of the majority of the recommendations contained in the EMSU report. Implementations of actions that have not been completed are noted in the section of this report titled Findings, Conclusions, and Recommendations.

Overview

Seges Partners Mobile Home Park L.L.C. is one of seven entities owned by M&C Management L.L.C. ("M&C") which is owned by a Managing Partner. In 2006, Seges purchased the mobile home park containing 114 available lot spaces, with an average of 55-65

consistently occupied lot spaces located in Holts Summit, Missouri. As part of the purchase of the mobile home park, the Company became the owner and operator of the water and sewer distribution system, and bills its customers for water and sewer service each month in combination with lot rental fees.

Seges originally obtained consent from Callaway County PWS #1 to provide water service, and consent from the City of Holts Summit to provide sewer service within the mobile home park. The cost of water and sewer service was included in the lot rental fees. The Company later decided to install individual meters to each lot space and began billing its customers a separate charge based on actual usage for water service and sewer service each month. This action required the Company to be a public water system and operate under the rules of the Missouri Department of Natural Resources (MDNR) and the Commission. The Company applied to the Commission for a certificate of convenience and necessity to provide water service in June of 2008. In addition the Commission staff found the Company billed for sewer service and required the Company to obtain a certificate of convenience and necessity to provide sewer service to the residents of the mobile home park. The Commission approved water and sewer tariffs effective December 31, 2009 for the Company.

M&C employees provide staff support for Seges operations. The Manager of M&C is only an investor in Seges and receives no compensation directly from Seges. There are two owners of Seges, none of which are actively involved in the day-to-day operations and duties of the Company. Seges day-to-day operations are ran by the Office Manager and Park Manager. The Office Manager and Park Manager are employees of M&C; however, their responsibilities are divided among multiple entities including duties performed for Seges. Both the Office Manager and the Park Manager are considered contract employees and receive their payroll from M&C. The predetermined salaries of the contract employees are included in a management fee charged to Seges by M&C and are not based on hourly wages connected to actual work performed.

The Company has a maintenance office within the mobile home park in Holts Summit, Missouri, and a business office in Sedalia, Missouri, with business hours of the business office being Monday to Friday 8:30 a.m. to 5:00 p.m. The Office Manager works at the business office and the Park Manager resides and works at the mobile home park. The Office Manager is responsible for all administrative tasks associated with Seges such as accounts payable, accounts

receivable, customer billing, credit and collections, and financial statement preparation. The Park Manager is responsible for maintenance and repairs, meter reading, and responding to emergency calls. The Park Manager also hand delivers notifications and ensures documentation and payments are forwarded to the business office as required. This employee also holds a DS-I water distribution certificate and is the Company's registered operator with the MDNR.

Seges recently contracted with the City of Holts Summit to allow the Company to disconnect or cap-off the connection to the sewer service to vacant lots in the mobile home park in order to reduce the base rate Seges was charged from the City of Holts Summit. This contract allows Seges to cap the connections to the vacant lots above grade because many of the connections were poured in concrete making it expensive and difficult to cap-off the connection at the main. In the event a lot shall be re-connected, a connection and inspection permit is required at a cost of \$400.00. This contract with the City of Holts Summit will reduce reoccurring costs the Company previously incurred for connections to the sewer system by eliminating the monthly fee charged per each vacant lot by the City of Holts Summit.

Customer Billing

The current monthly customer charge for sewer service is \$27.53 with an additional \$3.86 for each 1,000 gallons of metered water usage. The Office Manager e-mails the Park Manager a meter reading sheet prior to the 20th of each month containing each lot number and name of customer. Water meters are read manually by the onsite Park Manager on the 20th of each month (or closest business day to the 20th), and are then recorded, scanned, and e-mailed to the Sedalia office. Meter readings are entered into TenantPro, the Company's billing software program. The customers' actual water usage is used to calculate the amount of the sewer bill. In the event the Office Manager notices an unusually high or low read, each instance is investigated prior to generating the billing statement. After reviewing each bill, customer billing statements are then electronically generated, printed, and mailed by the Office Manager from the business office in Sedalia around the 22nd day of each month.

Payment Remittance

Customers' bills are due on the 15th day of the month following the issuance of the customer billing statements. Customers are allowed between 21 and 25 days to pay their bill

before it is considered delinquent each month. Customer payment options include automatic clearing house (ACH) transactions, check, credit card, debit card, or money order. The Company does not accept cash payments and money orders are only accepted by the Park Manager with prior arrangements. The majority of customers remit payments by check or money order to the business office. In the event the Park Manager collects a payment, those monies are forwarded to the business office in Sedalia for processing. There is a three percent fee assessed to all payments remitted by credit or debit card, which is the amount the Company must pay the vendor in order to accept credit card transactions.

Credit and Collections

Customers initiate service with the Company by completing a customer application at the Company's business or maintenance office. This is done as part of the customer's initial paperwork for becoming a tenant. The Company then conducts a credit and criminal background check and, if approved, all necessary paperwork is processed at the business office and the agreement is e-mailed to the maintenance office to be signed in person by the customer. Although the Company does not charge customers a deposit for water or sewer services individually, it conducts background checks on potential tenants, as the potential tenant renting a mobile home from the Company will also become a water and sewer customer. All initial paperwork must be signed in person and any monies required for deposits on rent or down payments are collected at the time of initiation of service.

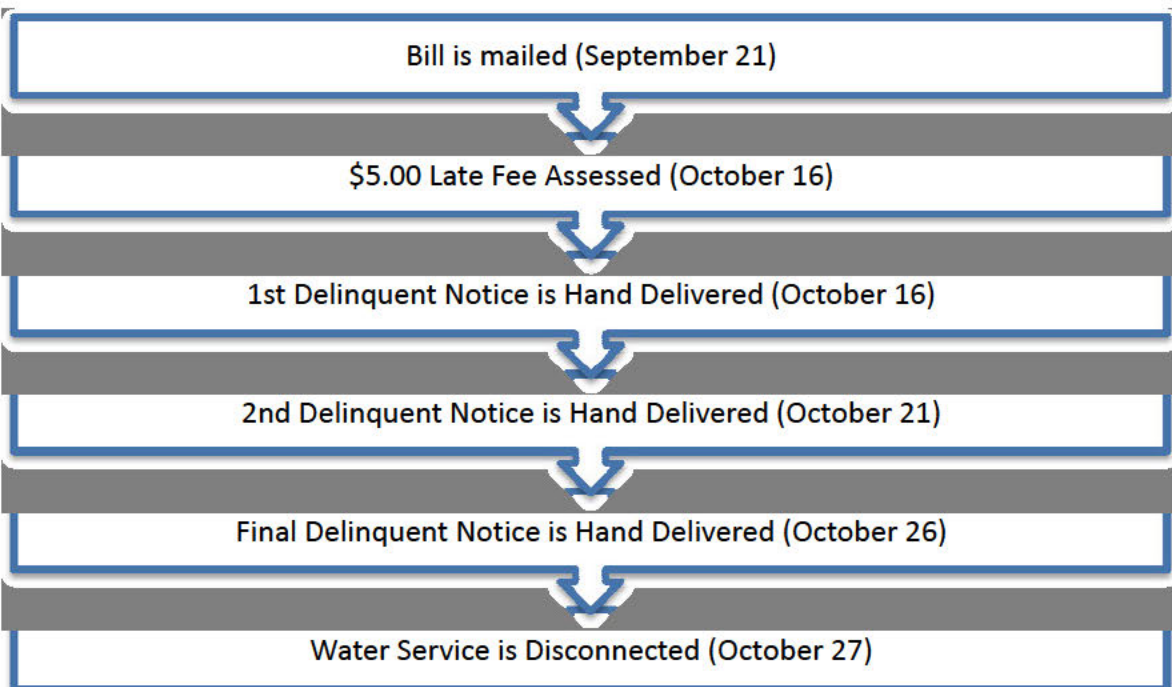
On the next business day after the 15th day of the month (billing due date), a \$5.00 late fee is applied to all delinquent accounts. On the 16th of the month, the Office Manager generates a notice of service discontinuance letter to the delinquent customers and e-mails the letter to the Park Manager to hand deliver to the homes of the delinquent customer(s). The letter includes the amount of the late charges applied and the date service will be discontinued if no payment is received. If no payment or contact attempt is made on the day after the 20th business day of the month, the business office generates a service discontinuance letter. If no payment occurs by the 26th of the month (or next business day if the 26th is on a weekend), a second service discontinuance letter is generated. After thirty-one (31) days with no payment attempt, a 24-hour notice of service discontinuance letter is generated for the remaining delinquent customers. All

notices are hand delivered by the Park Manager. If payment is still not made after 24-hours, water service is discontinued and a final bill letter is generated.

The Company's current tariff includes processes in which the Company will mail written notices to customers and the Commission by certified mail thirty (30) days prior to discontinuance of service. The Company does not currently follow the processes identified in their tariff. The EMSU staff contacted the Office Manager and discussed possible options to ensure there is documentation which includes a date and signature the customer receives such notices until the tariff matter is resolved. The Commission's Water and Sewer Department will address this matter during its review of the Company's tariffs.

Following discontinuance of service, customers are required to pay the balance due including the late fee that was previously applied, a \$25.00 disconnect fee, and a \$50.00 reconnect fee. Once payment has been received, service is restored as soon as possible. Below is an illustration of the actions the Company would follow on a delinquent account. This illustration reflects a bill that was mailed September 21.

Delinquent Account Process



The table below illustrates the number of discontinuances for non-payment for 2010, 2011, and year-to-date September 2012. Company personnel indicated that the majority of the customers who are delinquent will make payments on their utility services to avoid discontinuance of service. The table below indicates there are few instances of service discontinuances since 2010 and the amount of discontinuances have declined.

Number of Service Discontinuances

Month	2010 Discontinuances	2011 Discontinuances	YTD Sept 2012 Discontinuances
January	1	1	0
February	1	0	1
March	2	1	0
April	0	0	1
May	1	1	1
June	1	0	0
July	0	0	0
August	0	0	0
September	2	2	1
October	0	1	
November	0	0	
December	0	0	
Total:	8	6	4

Source: Seges Data Request Response #27

The Company indicated that most of the service discontinuances occur when tenants have moved away from the area. Throughout the process of the actions taken to collect monies on accounts in arrears in addition to the notices that are hand delivered, phone calls are also made by the Office Manager attempting to set up payment arrangements and to work with the customers to prevent discontinuance of service. The Company attempts to avoid discontinuances of service late in the week if possible to ensure customers are not without services on non-business days. The table below displays the dollar amount of the Company's delinquent accounts as of September 2012.

Dollar Amount of Delinquent Accounts

Year	31-60 days	61-90 days	90+ days	Total
2012	\$207.97	\$174.59	\$4,324.36	\$4,706.92

Source: Seges Data Request Response #30

The table below displays the dollar amount of the Company’s uncollectible expense reported for January 2010 through September 2012. The dollar amounts below are included in the 90+aging amounts in the table above.

Uncollectible Write-offs

Year	2010	2011	YTD Sept 2012	Total
\$ Amount	\$739.56	\$1229.45	\$278.56	\$2247.57

Source: Seges Data Request Response #35

The Company received seven insufficient funds checks totaling \$3,332.36 from January 2010 through September 2012. Of the \$3,332.36, only \$252.50 remains uncollected. The Company has not utilized a collection agency and does not intend to contract with any type of collection agency. The table below illustrates there was a slight peak for 2011 in the amount of insufficient funds however the number has decreased for year-to-date September 2012.

Insufficient Funds Log

Year	Number of Checks	Total Dollar Amount
2010	2	\$1,110.40
2011	4	\$1,941.68
YTD Sept 2012	1	\$280.58
Total	7	\$3,332.66

Source: Seges Data Request Response #34

Complaints and Inquiries

Customers that have a complaint or inquiry with the Company may call or come by the business or maintenance office during normal business hours. The Company maintains a customer complaint log which includes documentation of the resolution if an investigation or maintenance check is warranted. The Park Manager and the Office Manager handle all complaints or inquiries. According to the Commission’s Electronic Filing Information System, there were no reported complaints on file with the Commission from January 2010 through September 2012.

Customer Communication

The Company’s customer billing statements contain a message box where the Company includes information regarding contact information for billing questions as well as the due date

for utility services. The Company mails letters to customers, when appropriate, to relay information such as a rate case filing. The Company also has an informational brochure which contains all necessary information according to Commission rules.

Records and Documentation Retention

Seges maintains all customer files at the Sedalia, Missouri business office either in a file cabinet or fireproof storage boxes. Meter reading sheets are also kept at the business office. Older records are stored off-site. Customer account records are kept electronically through the Company's billing software program. All the Company's electronic records are backed up daily online by the data storage program Carbonite.

Findings, Conclusions, and Recommendations

The following discussion presents a summary of the findings, conclusions, and recommendations pertaining to the Company's customer service operations. The information presented in this section focuses on the following issue that requires Company management's attention:

- Time Keeping Records

Time Keeping Records

The Company's system for documenting employee time is not complete for all of its employees and is not adequate for summarization and analysis purposes. The Company has attempted to maintain documentation regarding the activities completed, sorted by employee, and noting the date each activity was performed. There is no detail on the amount of hours worked each day associated with the particular activities indicated on the time records for all of the employees performing duties for Seges. These records are difficult to summarize and analyze for rate making and other review purposes.

Maintaining accurate time records can serve and support several purposes such as planning, budgeting, and human resources. Time records assist in tracking the amount of time employees expend on all projects, enabling schedules of required work to increase operational efficiencies. Accurate and detailed time sheets create a record; serve as visual feedback to personnel and the employees of the work and projects that have been accomplished. Data

contained in time records should be linked to accounting records and provide the necessary support for financial reporting and allocation of costs. Employee time records are useful in the regulatory process to support the pay and benefits that regulated utilities will receive in customer rates.

The EMSU staff previously made a recommendation to the Company in Case No. SR-2011-0133 to initiate time reporting for Company employees. The Company did implement a practice to record daily activities associated with Seges as well as other non-regulated entities. The EMSU staff reviewed the Company's actions and found them appropriate in most instances in response to the previous recommendation.

It is the opinion of the EMSU staff that the Company could improve its time records by using a standard form time sheet to track hours, location of work, and a general description of the activity for all of its employees. The Company should also consider and is encouraged to maintain its time records in an electronic format, such as Excel. An electronic format would facilitate a more efficient process and provide for a more accurate record. In addition, data could be easily searched and summarized, if necessary. The time sheet should also note time spent on activities unrelated to the operation of its regulated sewer company. Some utilities use one standard sheet to include vehicle mileage which captures all information on one document. The EMSU staff will provide sample time sheets to the Company that may assist in implementing the following recommendation.

THE EMSU STAFF RECOMMENDS THAT COMPANY MANAGEMENT:

Develop and utilize time sheets to record work assignments and the time associated with each work assignment. This recommendation should be completed within ninety (90) days of the effective date of any Commission order issued in this case, SR-2013-0112.

Implementation Review

The EMSU staff will conduct a review of the Company's progress regarding the implementation of the recommendation made in this report.

Agreement Attachment J

Summary of Case Events

Seges Partners Mobile Home Park L.L.C.
Case #SR-2013-0112
Summary of Case Events

Date Filed	September 19, 2012
Day 150	February 19, 2012
Extension?	No
If yes, why?	N/A
Amount Requested	\$3,326
Amount Agreed Upon	\$3,534
Item(s)/Dollar(s) Driving Rate Increase	Increase in wholesale price for processing sewage.
Number of Customers	58
Rate of Return	0.00%
Return on Equity	0.00%
Assessments Current	Yes
Annual Reports Filed	Yes
Statement of Revenue Filed	Yes
Other Open Cases before Commission	None
Status with Secretary of State	Good Standing
DNR Violations	None
Significant Service/Quality Issues	None

Staff Participant Affidavits

James M. Russo – Water & Sewer Department

Jerry Scheible – Water & Sewer Department

Jermaine Green-Auditing Department

David Williams – Engineering & Management Services Department

Deborah Bernsen – Engineering & Management Services Department

Tammy Veith – Engineering & Management Services Department

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

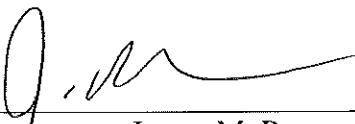
AFFIDAVIT OF JAMES M. RUSSO

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges)
Partners Mobile Home Park, LLC)

File No. SR-2013-0112

STATE OF MISSOURI)
) SS
COUNTY OF COLE)


COMES NOW James M. Russo, being of lawful age, and on his oath states the following: (1) that he is a Rate & Tariff Examination Supervisor in the Missouri Public Service Commission's Water and Sewer Unit ; (2) that he participated in the Staff's investigation of the small company rate increase request that is the subject of the instant case; (3) that he has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Sewer Company Revenue Increase Request* ("Disposition Agreement"); (4) that he was responsible for the preparation of Attachment A, E, F, G and J to the Disposition Agreement; (5) that he has knowledge of the matters set forth in Attachment A, E, F, G, and J to the Disposition Agreement; and (6) that the matters set forth in Attachment A, E, F, G, and J to the Disposition Agreement are true and correct to the best of his knowledge, information, and belief.



James M. Russo
Rate & Tariff Examination Supervisor
Water & Sewer Unit

Subscribed and sworn to before me this 13th day of February, 2013.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

AFFIDAVIT OF JERRY SCHEIBLE, P.E.

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges) File No. SR-2013-0112
Partners Mobile Home Park, LLC)

STATE OF MISSOURI

ss.

COUNTY OF COLE

COMES NOW Jerry Scheible, P.E., being of lawful age, and on his oath states the following: (1) that he is a Utility Regulatory Engineer in the Missouri Public Service Commission's Water and Sewer Unit ; (2) that he participated in the Staff's investigation of the small company rate increase request that is the subject of the instant case; (3) that he has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Water and Sewer Company Revenue Increase Request* ("Disposition Agreement"); (4) that he participated in the preparation of Attachment G to the Disposition Agreement; (5) that he has knowledge of the matters set forth in Attachment G to the Disposition Agreement; and (6) that the matters set forth in Attachment G to the Disposition Agreement are true and correct to the best of his knowledge, information, and belief.



Jerry Scheible, P.E.

Subscribed and sworn to before me this 14th day of February, 2013.





Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

AFFIDAVIT OF JERMAINE GREEN

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges) File No. SR-2013-0112
Partners Mobile Home Park, LLC)

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

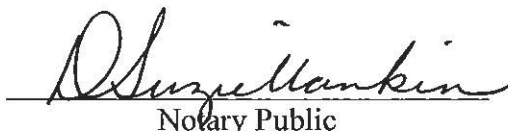
COMES NOW Jermaine Green, being of lawful age, and on his oath states the following: (1) that he is a Utility Regulatory Auditor in the Missouri Public Service Commission's Auditing Unit, (2) that he participated in the Staff's investigation of the small company rate increase request that is the subject of the instant case; (3) that he has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Sewer Company Revenue Increase Request* ("Unanimous Agreement"); (4) that he was responsible for the preparation of Attachment B, C & H to the Unanimous Agreement; (5) that he has knowledge of the matters set forth in Attachment B, C & H to the Unanimous Agreement; and (6) that the matters set forth in Attachment B, C & H to the Unanimous Agreement are true and correct to the best of his knowledge, information, and belief.



Jermaine Green
Utility Regulatory Auditor
Auditing Unit

Subscribed and sworn to before me this 14th day of February, 2013.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2016
Commission Number: 12412070



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

AFFIDAVIT OF DAVID WILLIAMS

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges)
Partners Mobile Home Park, LLC)

File No. SR-2013-0112

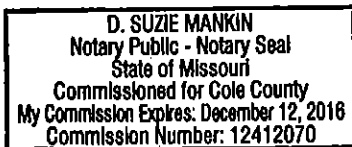
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW David Williams, being of lawful age, and on his oath states the following: (1) that he is a Utility Engineering Specialist in the Missouri Public Service Commission’s Engineering and Management Services Unit, (2) that he participated in the Staff’s investigation of the small company rate increase request that is the subject of the instant case; (3) that he has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Sewer Company Revenue Increase Request* (“Unanimous Agreement”); (4) that he was responsible for the preparation of Attachment D to the Unanimous Agreement; (5) that he has knowledge of the matters set forth in Attachment D to the Unanimous Agreement; and (6) that the matters set forth in Attachment D to the Unanimous Agreement are true and correct to the best of his knowledge, information, and belief.

David Williams

David Williams
Utility Engineering Specialist
Engineering and Management Services Department

Subscribed and sworn to before me this 14th day of February, 2013.



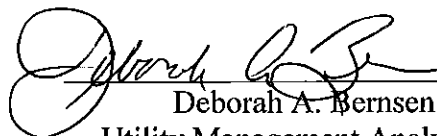
D. Suzie Mankin
Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
AFFIDAVIT OF DEBORAH A. BERNSEN

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges) File No. SR-2013-0112
Partners Mobile Home Park, LLC)

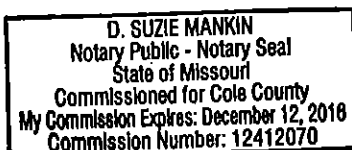
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

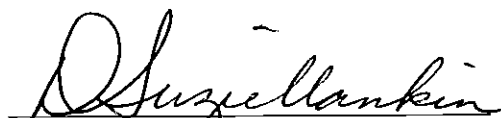
COMES NOW Deborah A. Bernsen, being of lawful age, and on her oath states the following: (1) that she is a Utility Management Analyst in the Missouri Public Service Commission's Engineering & Management Services Unit; (2) that she participated in the Staff's investigation of the small company rate increase request that is the subject of the instant case; (3) that she has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Sewer Company Revenue Increase Request* ("Unanimous Agreement"); (4) that she was responsible for the preparation of Attachment I to the Unanimous Agreement; (5) that she has knowledge of the matters set forth in Attachment I to the Unanimous Agreement; and (6) that the matters set forth in Attachment I to the Unanimous Agreement are true and correct to the best of her knowledge, information, and belief.



Deborah A. Bernsen
Utility Management Analyst III
Engineering & Management
Services Unit

Subscribed and sworn to before me this 13th day of February, 2013.





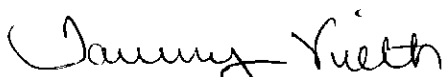
Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
AFFIDAVIT OF TAMMY VIETH

In the Matter of the Application for a Small)
Company Sewer Rate Increase for Seges) File No. SR-2013-0112
Partners Mobile Home Park, LLC)

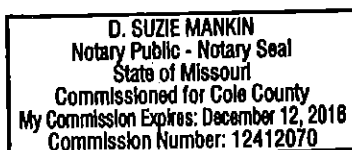
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

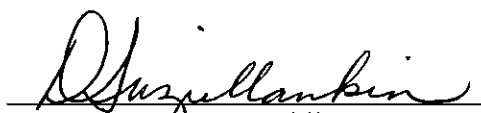
COMES NOW Vieth, Tammy, being of lawful age, and on her oath states the following: (1) that she is a Utility Management Analyst in the Missouri Public Service Commission's Engineering & Management Services Unit; (2) that she participated in the Staff's investigation of the small company rate increase request that is the subject of the instant case; (3) that she has knowledge of the foregoing *Unanimous Agreement Regarding Disposition of Small Sewer Company Revenue Increase Request* ("Unanimous Agreement"); (4) that she was responsible for the preparation of Attachment I to the Unanimous Agreement; (5) that she has knowledge of the matters set forth in Attachment I to the Unanimous Agreement; and (6) that the matters set forth in Attachment I to the Unanimous Agreement are true and correct to the best of her knowledge, information, and belief.



Tammy Vieth
Utility Management Analyst III
Engineering & Management
Services Unit

Subscribed and sworn to before me this 13th day of February, 2013.





Notary Public