

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

In the Matter of the Rate Increase)
Request of Seges Partners Mobile) File No. SR-2015-0106
Home Park, LLC.)

THE OFFICE OF THE PUBLIC COUNSEL’S POSITION STATEMENT

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Position Statement states as follows:

1. On October 27, 2014, Seges Partners Mobile Home Park, LLC (Seges) initiated a small company rate increase proceeding requesting an increase in its sewer rates of \$3,834 per year (approximately 12%).
2. On March 27, 2015, the Staff of the Missouri Public Service Commission (Staff) filed a *Notice of Company/Staff Agreement Regarding Disposition of Small Company Rate Increase Request* (Company/Staff Agreement), indicating an agreement between Staff and Seges for a sewer rate increase of \$2,178 per year (approximately 6.6%). Public Counsel did not join in the agreement.
3. Revised tariff sheets reflecting the proposed rates agreed to in the Company/Staff Agreement were filed by Seges on March 31, 2015.
4. As the Company/Staff Agreement was executed by only Seges and Staff, 4 CSR 240.3-050(15) requires Public Counsel to file a pleading stating its position regarding the Company/Staff Agreement and the related proposed tariff revisions, or requesting a local public hearing or an evidentiary hearing, no later than five (5) working days after the end of the comment period for the written customer notice contemplated in 4 CSR 240-3.050(14).

5. Public Counsel's own audit indicates that the revenue requirement for Seges should be significantly lower than what is reflected in the Company/Staff Agreement.
6. The major differences between Public Counsel's audit results and what is presented in the Company/Staff Agreement relate to overstated expenses for the Plant Operator/Park Manager as well as the erroneous inclusion of amortization expense in the revenue requirement.
7. While the revenue requirement is excessive, Public Counsel believes it does not justify the increased costs on customers that would be necessary to bring these issues before the Commission in an evidentiary hearing. Therefore, pursuant to the requirements in 4 CSR 240-3.050 (15), Public Counsel now states that it will not object to the Company/Staff Agreement or the related tariff revisions filed by Seges.

WHEREFORE, Public Counsel respectfully submits its Position Statement.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 4th day of May 2015:

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