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

In the Matter of the Application of Timber	)
Creek Sewer Company for a Certificate of	)
Convenience and Necessity Authorizing it	)
to Construct, Install, Own, Operate,	) File No. SA-2022-0338
Maintain, Control and Manage a Sewer	)
System in Clay County, Missouri as an	)
expansion of its Existing Certificated Areas	

## **RESPONSE TO STAFF RECOMMENDATION**

COMES NOW Timber Creek Sewer Company ("Timber Creek"), and for its *Response to Staff Recommendation* states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On June 1, 2022, Timber Creek filed an *Application and Motion for Waiver* ("*Application*") requesting permission and approval for a certificate of convenience and necessity ("CCN") to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in Clay County, Missouri as an expansion of its existing certificated service territory.
- 2. On June 9, 2022, the Commission issued its *Order Directing Staff Recommendation* that directed Staff to file its recommendation or a status report indicating when it expects to file a recommendation no later than July 14, 2022.
- 3. On July 14, 2022, Staff filed its recommendation for the Commission to grant Timber Creek a CCN with the conditions described in Staff's *Memorandum*.
- 4. Timber Creek has reviewed the proposed recommendations and conditions listed on pages 5-6 of Staff's *Memorandum* and states that it has no objection to the proposed recommendations and conditions.

**WHEREFORE**, Timber Creek requests the Commission issue an order approving Timber Creek's *Application* and granting Timber Creek a CCN as recommended in Staff's *Memorandum*, and for such other and further relief as deemed appropriate in the circumstances.

Respectfully submitted,

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ATTORNEYS FOR TIMBER CREEK SEWER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 18<sup>th</sup> day of July 2022 to all counsel of record.