

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

In the Matter of Confluence Rivers)	
Utility Operating Company, Inc.'s)	
Request for Authority to Implement a)	
General Rate Increase for Water)	Case No. WR-2023-0006
Service and Sewer Service Provided in)	
Missouri Service Areas)	

STATEMENT OF DISCOVERY CONCERNS

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Statement of Discovery Concerns*, states as follows:

1. The Commission issued an *Order Setting Procedural Schedule* in this case on February 16, 2023. Included in that *Order* was a requirement that:

Not less than three business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved.

2. Pursuant to the Commission’s *Order*, the OPC now files this statement of discovery concerns to be addressed at the discovery conference currently set for April 19, 2023.

3. The nature of the OPC’s discovery disagreement is as follows, the OPC has issued data requests (“DRs”) upon Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) and has received either objections to or incomplete answers regarding DRs 1105, 1111, 1112, 3000, 3002, 3003, 3004, 3005, 3006, 3007, 3008,

3009, 3010, 3011, 3012, 3016, 3018, 3019, 3020, 3021, 3023, 3024, and 3025. The OPC contests all of these objections and/or incomplete answers.

4. In addition, to the extent that Confluence Rivers has objected to any other DR issued by the OPC but has stated that it intends to still provide an answer of some nature, the OPC objects as necessary to preserve future discovery concerns.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission accept this statement of discovery concerns.

Respectfully submitted,

By: /s/ John Clizer
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this fourteenth day of April, 2023.

 /s/ John Clizer