

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

**Greater Jefferson City Construction
Company, Inc., and Edward P. Storey,**)

Complainants,)

v.)

Aqua Missouri, Inc.,)

Respondent.)

Case No. WC-2007-0303

STAFF'S STATEMENT OF POSITIONS ON ISSUES

COMES NOW the Staff of the Missouri Public Service Commission and provides the following Statement of Positions on Issues.

Issue No. 1: Is the Quail Valley Waste Water Treatment Facility capable of handling an additional 32 homes?

Staff's Position: Yes, based upon available engineering and measurement data.

Issue No. 1.a: If not, how many more can it handle?

Staff's Position: Not applicable.

Issue No. 2: If not, who is responsible for expanding the plant?

Staff's Position: Based upon the current tariff, the developer would be responsible for expanding the plant, if that is needed. The Staff believes the current tariff should be modified, to more clearly deal with financing and policies with regard to expansion of the plant.

Issue No. 3: Did Complainants apply for additional hookups and, if so, did Respondents deny such application?

Staff's Position: Unknown. This information is not part of the Staff's records.

Issue No. 4: If Complainants did apply for additional hookups, how many were applied for?

Staff's Position: Unknown. This information is not part of the Staff's records.

Issue No. 5: If Respondent did deny such application, was Respondent's denial of additional hookups wrongful, intentional, and without just cause or excuse?

Staff's Position: Unknown.

Issue No. 6: What was the original designed capacity of the Waste Water Treatment Facility?

Staff's Position: The plant was originally designed and permitted to serve a population equivalent of 296, based upon the assumption that there would be an average of 3.7 people served at each of 80 connections.

WHEREFORE, the Staff submits its Statement of Positions of Issues to the Commission.

Respectfully submitted,

/s/ **Keith R. Krueger**

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record on this 17th day of October 2007.

/s/ **Keith R. Krueger**