

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

In the Matter of Missouri-American Water )  
Company for Certificates of Convenience and )  
Necessity Authorizing it to Install, Own, Acquire, )  
Construct, Operate, Control, Manage and )  
Maintain a Sewer System in an area of Clinton )  
County, Missouri (Timber Springs Estates) )

**File No. SA-2019-0183**

**MISSOURI-AMERICAN WATER COMPANY'S REPLY  
TO STAFF RESPONSE**

**COMES NOW** Missouri-American Water Company, and provides its *Reply to Staff Response*. On March 14, 2019, the Commission issued its *Order Directing Filing*, directing the Commission's Staff to answer a series of questions regarding MAWC's proposed area Certificate of Convenience and Necessity. The Staff filed its *Response to Order* ("Staff Response") on March 26, 2019. MAWC replies to the Staff Response as follows:

1. *Does MAWC provide water service in the proposed CCN area?*

***MAWC does not currently provide water service in the proposed CCN area.***

a. *If not, who does?*

***The general area does not receive water service from any Commission regulated entity. MAWC believes that some of the area is served by the City of Plattsburg, through a water plant on Smithville Lake. However, the proposed CCN area, as amended, does not include the city limits of any municipality.***

b. *Does MAWC plan to acquire a water CCN for this service area?*

***No.***

2. *What is the difference in area between the proposed CCN and the Timber Springs Estates subdivision?*

***Please see response of Staff.***

3. *Why should a CCN be granted for an area extending beyond the Timber*

*Springs Estates subdivision?*

**MAWC agrees with Staff's response. MAWC further adds that the Director of the Department of Natural Resources has also stated that the consolidation of small water and sewer systems are a priority for the State of Missouri.**

4. *MAWC is in talks with one of two other sewer systems in the area, how many customers do those systems serve?*

**Clinton Estates has approximately 57 connections with another six in the process of being built for a total of 63 connections. Centennial Acres has approximately 19 connections.**

a. *Who owns those sewer systems?*

**Each of these systems are owned and operated by Homeowners Associations and are not regulated by the Commission.**

b. *Are the customers residential?*

**Yes.**

a. *Have the owners of the other sewer systems or their customers expressed an interest in being acquired?*

**Yes, as to Clinton Estates.**

b. *What is the status of any potential acquisition?*

**MAWC is working on final approval and a potential contract, and waiting on the outcome of this matter so Clinton Estates and MAWC will know whether they will have to go through the time and expense of a separate certificate/acquisition case.**

5. *What, if any, harm would result of approval of only the Timber Springs Estates subdivision area, if no additional residential growth is expected?*

**MAWC agrees with Staff's response.**

6. *What, if any, harm would result from applying for approval of an additional service area as additional systems are acquired?*

***MAWC agrees with Staff's response.***

7. *Are there any instances where the Commission has purposefully granted overlapping CCN areas? Why?*

***MAWC agrees with Staff's response.***

**WHEREFORE**, MAWC respectfully submits its *Response to Order* for the Commission's information and consideration, and requests the Commission grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

***/s/ Tim Luft***  
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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record on this 26<sup>th</sup> day of March, 2019.

***/s/ Tim Luft***