

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

In the Matter of the Application of Missouri-American)
Water Company for a Certificate of Convenience and)
Necessity Authorizing it to Install, Own, Acquire,)
Construct, Operate, Control, Manage and Maintain a)
Water System and Sewer System in and Around the)
City of Eureka, Missouri)

Case No. WA-2021-0376

**RESPONSE TO DECEMBER 29, 2021
ORDER RE THE FLINN ENGINEERING REPORT**

COMES NOW Staff of the Missouri Public Service Commission (Staff), through counsel, and files its response to the Commission’s December 29, 2021 *Order Directing Applicant to Supplement Application* (Order).

1. In this Order, the Commission directed Missouri-American Water Company (MAWC) and Staff to file all versions of the Flinn Engineering report with supporting affidavits. Staff’s witnesses were not involved with preparing these reports, therefore Staff files this pleading with no affidavits.

2. As Staff stated on page 14 of its October 1, 2021, *Memorandum*, MAWC provided Staff with two versions of the Flinn Engineering report. The earlier report, dated January 18, 2020, and attached hereto as Appendix A, estimates a book value of \$16,086,901 for the Eureka water and sewer assets. MAWC provided this version of the report in its response to DR 15, in which Staff requested the Flinn Engineering report referred to in the valuation report attached to MAWC’s April 26, 2021, *Application and Motion for Waiver*.

3. However, the valuation report refers to a Flinn Engineering report dated March 16, 2020. In its response to Staff’s DR 35, MAWC provided a copy of the

March 16, 2020, report. The second report, attached hereto as Appendix B, estimates a book value of \$31,449,014 for the same assets.

4. MAWC represented in its response to DR 35 that it has no other appraisals or valuation reports associated with the sale of the Eureka assets.

WHEREFORE, Staff files the two versions of the Flinn Engineering report that MAWC provided, for the Commission's consideration and information.

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz
Deputy Director
Missouri Bar No. 70632
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5472 (Voice)
573-751-9285 (Fax)
Karen.Bretz@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 3rd day of January, 2022.

/s/ Karen E. Bretz