

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

In the Matter of the Joint Application of )  
Confluence Rivers Utility Operating Company, Inc.; )  
Hillcrest Utility Operating Company, Inc.; ) **Case No. WM-2021-0412**  
Elm Hills Utility Operating Company, Inc.; )  
Osage Utility Operating Company, Inc.; )  
Raccoon Creek Utility Operating Company, Inc.; and )  
Indian Hills Utility Operating Company, Inc. for )  
Approval of a Merger Whereby Confluence Rivers )  
Will Be the Surviving Corporation and of Related )  
Transactions )

**STAFF RESPONSE TO COMPANIES**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its *Response to Companies*, respectfully states:

1. On June 1, 2021, Confluence Rivers Utility Operating Company, Inc., Hillcrest Utility Operating Company, Inc., Elm Hills Utility Operating Company, Inc., Osage Utility Operating Company, Inc., Raccoon Creek Utility Operating Company, Inc., and Indian Hills Utility Operating Company, Inc. (Companies) filed a *Joint Application and Motion for Waiver* seeking to merge certain water and sewer assets of the above-referenced entities into Confluence Rivers Utility Operating Company. On September 14, 2021, Staff filed its *Recommendation*. The Office of the Public Counsel (OPC) filed a *Response to Staff Recommendation* on September 22, 2021. On September 24, 2021, the Companies jointly filed a response to OPC and Staff. Staff now responds.

2. The Companies outlined some alterations to the language of Staff’s condition ten (10) of its *Recommendation*, regarding the reporting of certain information

to the Customer Experience department of Staff. Staff agrees to the language with the proposed modifications as written in the Companies' joint response:

Require Confluence to provide CXD staff with a monthly call center statistical report regarding: calls offered to representatives, calls answered, abandoned call rate (ACR), and average speed of answer (ASA). This report should also include total number of customer service representatives employed by Confluence's 3rd Party Customer Service vendor. This report should start within thirty (30) days after the first full month after the merger.

3. OPC in its *Response* requested that the Companies file all limited liability company (LLC) and other organizing agreements into the docket:

1) Confluence Rivers Utility Operating Company, Inc. ("Confluence") files into the record in this case copies of the current LLC agreements (and any other agreements, such as operating, management or other contractually binding agreements executed in connection therewith) for Page 2 of 3 the following entities: CSWR LLC, US Water Systems LLC, and any other entity created for the sole purpose of owning and managing CSWR LLC's Missouri water and sewer systems.

Staff does not oppose this condition.

**WHEREFORE**, Staff prays that the Commission will accept this *Response*; accept Staff's conditions as outlined in its *Recommendation* and including the modifications to condition ten (10) as indicated here; and grant such further and other relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Payne**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of October, 2021, to all counsel of record.

**/s/ Whitney Payne**