

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

In the Matter of Confluence Rivers Utility    )  
Operating Company, Inc.’s Request for a    )     **File No. WR-2020-0053**  
Water Rate Increase                            )

**CONFLUENCE RIVERS’ RESPONSE TO ORDER DIRECTING RESPONSES  
REGARDING DELAY OF TARIFF EFFECTIVE DATES**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc., by and through the undersigned counsel, and responds as follows to the Missouri Public Service Commission’s (“Commission”) March 30, 2020 *Order Directing Responses Regarding Delay of Tariff Effective Dates Due to Covid-19 Pandemic* (“Order”):

1.     The *Order*, among other things, directed that Confluence Rivers respond by noon on April 3, 2020, to the following:

- whether “. . . Confluence Rivers is willing to voluntarily extend the effective date of its filed tariffs for 90 days due to the ongoing impact of the COVID-19 pandemic;” and,
- “. . . identify what measures, if any, it is currently taking or will take to help customers facing disconnections due to lack of payment or late payment fees due to the economic impacts of COVID-19.”

2.     Confluence Rivers will respond in the following paragraphs both as to its willingness to delay the proposed effective dates of the tariffs identified and to explain the actions it has previously taken to help customers, to include the suspension of disconnections and late payment fees.

**DELAY OF TARIFF EFFECTIVE DATE**

3.     Confluence Rivers recognizes the issues raised by the *Order* and is willing to voluntarily delay the effective date of its currently filed tariffs identified as Tracking Nos. YS-2020-0156 and YW-2020-0155. However, because of certain practical matters, Confluence

Rivers would ask the Commission to consider whether delaying the effective date by slightly less than 90 days would satisfy the issues raised by the *Order* and achieve the Commission's objective of ameliorating some of the financial effects of the COVID-19 pandemic on customers.

4. As the Commission may be aware, Confluence Rivers bills in arrears on the 5<sup>th</sup> day of each month for services provided in the prior calendar month. Thus, for example, a rate increase that goes into effect on February 1, would not be evident in a customer's bill until the March 5<sup>th</sup> bill is sent. Additionally, while Confluence Rivers is able to pro-rate bills when rate changes happen in mid-month (and would have done so here, if rates were to have gone into effect on April 12), there is some simplicity in having a rate go into effect on the first day of a month as to avoid the need for proration.

5. As a result of these factors, Confluence Rivers would like to propose that it voluntarily extend the proposed effective dates of the filed tariffs (Tracking Nos. YS-2020-0156 and YW-2020-0155) from April 12, 2020, to July 1, 2020.<sup>1</sup> Such extension would be slightly shorter than the 90 days identified in the *Order* (80 days). However, because of the factors identified above, customers would not receive a bill reflecting an increase until August 5, 2020 – approximately four months from today.

#### **CONFLUENCE RIVERS' PREVIOUS ACTIONS IN REGARD TO DISCONNECTIONS AND LATE FEES**

6. As indicated above, Confluence Rivers (and, in fact, all the Central States Water Resources family of Missouri public utilities) has been proactive in regard to COVID-19 responses. Attached as Appendix A is a letter to the Commission's Division Directors that was sent on March 27, 2020, providing a synopsis of the steps Central States' companies have taken in regard to disconnections (shut-offs suspended), reconnections (for those impacted by the

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<sup>1</sup> A 90-day extension would have taken the proposed effective date to July 11, 2020.


pandemic), reliability, workforce staffing, essential supply tracking, and customer communications. Moreover, Confluence Rivers is also waiving late payment fees. The above efforts began on March 13, 2020 and will continue until it is reasonable to take a different path. Confluence Rivers will continue to keep the Commission informed of its actions as situations develop or change.

7. Samples of the letters sent to the customers of Confluence Rivers, Elm Hills Utility Operating Company, Inc.; Raccoon Creek Utility Operating Company, Inc.; Hillcrest Utility Operating Company, Inc.; and, Indian Hills Utility Operating Company, Inc. are attached hereto as **Appendix B**. Additional information about efforts to ease the effects on customers of the COVID-19 pandemic can be found on the Company's website: [www.centralstateswaterresources.com](http://www.centralstateswaterresources.com).

**WHEREFORE**, Confluence Rivers Utility Operating Company, Inc., respectfully submits its responses for the Commission's consideration and requests that the Commission issue such orders as it should find to be reasonable and just.

Respectfully submitted,

**BRYDON, SWEARENGEN & ENGLAND P.C.**

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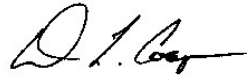
ATTORNEYS FOR CONFLUENCE RIVERS  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served by electronic mail to counsel on this 3<sup>rd</sup> day of April, 2020:

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