

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

In the Matter of the Application of)	
Confluence Rivers Utility Operating)	
Company, Inc., to Acquire Certain)	
Water and Sewer Assets, and For)	Case No. WM-2020-0282
Certificates of Convenience and)	
Necessity)	

**MOTION TO SUSPEND CURRENT SCHEDULE, REQUEST FOR NOTICE TO
CUSTOMERS, AND REQUEST FOR LOCAL PUBLIC HEARING**

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Motion to Suspend Current Schedule, Request for Notice to Customers, and Request for Local Public Hearing*, states as follows:

1. On March 11, 2020, Confluence Rivers Utility Operating Company, Inc. (“Confluence”) filed an application with the Missouri Public Service Commission (“the Commission”) seeking authority to acquire the assets of Branson Cedars Resort Utility Company LLC; Fawn Lake Water Corp.; Freeman Hills Subdivision Assoc.; P.A.G. LLC, d/b/a Prairie Heights Water Company; and a sewer system located in DeGuire Subdivision and owned by Mr. Mark Edgar.¹

2. On July 17, 2020, the Staff of the Public Service Commission (“Staff”) filed its recommendation regarding Confluence’s application. In the *Memorandum* attached to that recommendation, Staff noted as follows:

¹ Confluence Rivers also sought to purchase the water and sewer assets of Terre du Lac Utilities Corporation, but has since filed to voluntarily dismiss that portion of the Application.

At the present time, there have been no notifications or meetings held to inform the customers of the pending case. Staff recommends that Confluence Rivers ensure that customers are sent a notice of the proposal for Confluence Rivers to acquire the water and sewer systems and how to submit a Public Comment to the Commission if they desire.

3. The OPC agrees with Staff's assessment of the need to provide Confluence's prospective new customers notice of this pending acquisition and further believes those customers should be given an opportunity to provide their comments directly to the Commission.

4. Consequently, the OPC requests that the Commission (1) suspend the current schedule for this case including the need for responses to Staff's recommendation to be filed within ten days of the date it was filed, (2) order Confluence to provide notice of the pending acquisition to all customers on the systems to be acquired, and (3) set dates for a local public hearing to be held in this matter.²

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission suspend the current schedule, order notice of the pending acquisition be sent to customer, and set dates for a local public hearing to be held in this matter.

Respectfully submitted,

By: /s/ John Clizer
John Clizer (#69043)
Senior Counsel

² In light of the ongoing COVID-19 pandemic, the OPC would suggest that the local public hearing be administered virtually in the same manner as has now been employed for cases WR-2020-0264 and WR-2020-0344. The OPC further notes that this will have the added benefit of allowing for one single local public hearing to reach all prospective customers.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this twentieth day of July, 2020.

/s/ John Clizer