

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

In the Matter of Liberty Utilities (Missouri Water))
LLC and Ozark International, Inc., Concerning)
an Agreement to Acquire the Assets of Bilyeau)
Ridge Water Company, LLC Midland Water)
Company, Inc., Moore Bend Water Utility,)
LLC, Riverfork Water Company, Taney County)
Water, LLC And Valley Woods Utility)

File No. WM-2018-0023

OPC COMMENTS TO STAFF RECOMMENDATION

COMES NOW the Office of the Public Counsel (“OPC”) and, pursuant to the Commission’s November 8, 2017 *Order Adopting Procedural Schedule*, submits its comments on the Staff of the Public Service Commission (“Staff”) Recommendation filed January 5, 2018. OPC comments as follows:

1. On September 14, 2017, Liberty Utilities (Missouri Water) LLC and Ozark International, Inc. filed their *Joint Application for Authority to Transfer Assets*.
2. On November 8, the Commission adopted the parties’ proposed procedural schedule, wherein the Commission directed Staff to file its recommendation no later than January 5, 2018; and for parties to submit comments to Staff’s recommendation not later than January 15.
3. On January 5, 2018, Staff submitted its *Staff Recommendation*, wherein it recommended the Commission approve the transfer, subject to sixteen conditions.
4. Upon review of Staff’s recommendation, OPC supports Staff’s recommendation that the Commission approve the application subject to the sixteen conditions.

5. OPC remains in discussions with Staff to address a minor accounting adjustment that would have a *de minimis* revenue requirement impact. While these discussions continue, the resolution of the issue in OPC's favor or Staff's favor would not affect OPC's comment in support of Staff's Recommendation subject to the conditions detailed therein.

WHEREFORE, OPC provides this comment in support of Staff's Recommendation subject to the conditions therein for the Commission's consideration.

Respectfully submitted,

/s/ Hampton Williams
Hampton Williams
Acting Public Counsel
Missouri Bar No. 65633

Office of the Public Counsel
Post Office Box 2230
Jefferson City, MO 65102
(573) 751-4857 (Voice)
(573) 751-5562 (FAX)
Hampton.Williams@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 16th day of January, 2018.

/s/ Hampton Williams