

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

In the Matter of the Joint Application of 188 North)
Summit, LLC, and Seges Utility Company, LLC)
For Authority to Sell the Water System and)
Wastewater System Assets of Seges Mobile)
Home Park, LLC, to Seges Utility Company, LLC,)
and For a Certificate of Convenience and)
Necessity To Provide Water and Sewer Services.)

File No. WM-2023-0065

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through counsel, and recommends that the Commission authorize the sale of water and sewer utilities belonging to 188 North Summit, LLC (188NS) to Seges Utility Company, LLC (Seges). Staff further recommends that Seges be issued a new certificate of convenience and necessity (CCN) to provide water and sewer service in the territory 188NS currently serves and that 188NS' CCN be cancelled. In support, Staff states as follows:

1. 188NS and Seges filed their *Joint Application and Motion for Waiver* (Application) on August 10, 2022. In it, the parties seek Commission authority for 188NS to sell to Seges its water and sewer assets located within the Seges Partners Mobile Home Park in Callaway County, Missouri. 188NS sold this mobile home park to Seges Partners Mobile Home Park, LLC (Seges Partners MHP) in August, 2022.

2. The Commission regulates the water and sewer systems at this mobile home park. Seges Partners MHP rents spaces and provides water and sewer service to approximately 55 residents. As an alternative to transferring 188NS' CCN, the parties request that Seges be issued a new CCN in order to provide water and sewer service in 188NS' current service territory.

3. Attached to the Application is a purchase agreement between 188NS and MHP Equity Group, LLC, a foreign limited liability company registered in Missouri. Staff understands that Seges, Seges Partners MHP, and MHP Equity Group, LLC have a common owner. The applicants state in paragraph eight of their Application that MHP Equity Group, LLC has assigned its rights to Seges.¹

4. The applicants also request waivers of the 60-day notice requirement of 20 CSR 4240-4.017, the requirement of 20 CSR 4240-3.305(1)(A)5 that the names of ten residents be submitted with the application, and the requirement of 20 CSR 4240-3.600(1)(A)5 that a feasibility study be submitted with the application. The applicants verified that in the prior 150 days, they had no communication with the Commission regarding any substantive issue in this case. Staff does not object to the Commission waiving the 60-day notice requirement. The applicants provided Staff with the names of ten residents during Staff's investigation, and this list is attached to Staff's memorandum. Therefore, a waiver from this requirement is no longer necessary.

5. Regarding the requested waiver from the Commission rule requiring a feasibility study, Staff is not opposed to the Commission waiving this requirement because: (a) Seges has a low risk financial profile, (b) Seges has no current debt and it will not have any debt resulting from this transaction, (c) Seges does not believe the systems need immediate repairs or improvements, (d) Seges can file a rate case in the future if it determines that it must raise rates to meet expenses and to avoid net operating loss issues, (e) Seges recently purchased the mobile home park, (f) Seges states that 188NS' onsite management and operations personnel will remain after the transfer,

¹ Paragraph 16 of the purchase agreement states that, "The Purchaser shall have the right to assign its rights under this Agreement to an affiliated entity by providing written notice of such assignment to the Seller."

(g) the Public Water Supply District providing water states that it has no plans to alter current rates, and (h) Seges represents that negative net operating balances for the utility systems will be offset by revenues from the mobile home park's pad rents.

6. On August 15, 2022 the Commission ordered Staff to file a recommendation regarding the Application, or a request for additional time to file its recommendation, by September 29, 2022. Staff filed two motions for an enlargement of time to file its recommendation, which the Commission granted. Staff's recommendation is due November 3, 2022.

7. The Commission granted the original water and sewer CCNs for this mobile home park to Seges Partners Mobile Home Park, LLC ("Seges Partners") in an order dated August 12, 2009.² Thereafter, Seges Partners sold the mobile home park to 188NS, and on September 19, 2017 the Commission granted 188NS and Seges Partners' application allowing 188NS to purchase the water and sewer assets and granting it the CCNs.³ Almost two years later, 188NS filed an application to surrender its CCNs and decertify the company as a public utility subject to the Commission's jurisdiction. 188NS argued that because it offers and provides water and sewer service only mobile home park residents, it does not offer service to members of the public indiscriminately.⁴ Staff recommended that the Commission deny 188NS' petition,⁵ and 188NS withdrew its petition.⁶

² *Order Granting Certificates of Convenience and Necessity*, WA-2008-0403 (Aug 12, 2009).

³ *Order Granting Certificates of Convenience and Necessity and Granting Waiver*, WM-2018-0018 (Sep 19, 2017).

⁴ *Application to Surrender Certificates of Service Authority, to be Decertified as a Public Utility and Contingent Motion for Waiver*, SD-2019-0360 (May 22, 2019).

⁵ *Staff Recommendation*, SD-2019-0360 (Aug 7, 2019).

⁶ *Withdrawal of Application, Notice of Dismissal*, SD-2019-0360 (Sep 6, 2019).

8. Pursuant to § 393.170, RSMo, no water or sewer corporation shall provide service to consumers without first obtaining Commission approval. Section 393.190, RSMo requires Commission approval prior to a transfer of utility assets.

9. The Commission has articulated criteria to be used when evaluating CCN applications: (1) there must be a need for the service; (2) the applicant must be qualified to provide the service; (3) the applicant must have the financial ability to provide service; (4) the applicant's proposal must be economically feasible; and (5) the service must promote the public interest.⁷ These factors are referred to as the "Tartan factors." In addition to the Tartan factors, when considering application involving existing water and/or sewer systems, the Commission analyzes the applicant's technical, managerial, and financial (TMF) capabilities.

10. As explained in the Staff *Memorandum*, attached, Staff investigated 188NS and Seges' request. Based upon this, Staff determined that Seges fulfills the requirements of the Tartan criteria and possesses the necessary TMF capabilities. Accordingly Staff concludes that approving the utilities' sale to Seges is not detrimental to the public interest and that issuance of CCNs to Seges is necessary of convenient for the public service. Staff recommends that the Commission authorize 188NS and MHP Equity Group, LLC to enter into, execute, and perform in accordance with the terms described in the *Agreement for Sale and Transfer of Water Distribution System and Wastewater System*, attached as Appendix B-C to the parties' Application. Staff further recommends that the Commission cancel 188NS' CCN and that Seges be granted a

⁷ *In re Intercon Gas, Inc.*, 30 Mo. P.S.C. 554, 561 (1991); *In re Application of Tartan Energy Co.*, 3 Mo. P.S.C.3d 173 (1994).

new CCN to provide water and sewer service in the territory 188NS currently serves, with conditions described in the Staff *Memorandum*.

11. The Commission need not hold a hearing if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989). No party or individual has requested a hearing, so the Commission need not hold a hearing.

WHEREFORE, Staff submits this Staff Recommendation for the Commission's information and consideration.

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz

Deputy Counsel

Missouri Bar No. 70632

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been emailed to all parties and/or counsel of record on this 1st day of November, 2022.

/s/ Karen E. Bretz

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, File No. WM-2023-0065
188 North Summit, LLC and Seges Utility Company, LLC

FROM: Jarrod J. Robertson – Water, Sewer and Steam Department
Daronn A. Williams – Water, Sewer and Steam Department
Deborah Ann Bernsen – Customer Experience Department
Sarah Fontaine – Customer Experience Department
Seoung Joun Won, PhD – Financial Analysis Department

/s/ Jarrod J. Robertson 11/01/2022 /s/ Karen Bretz 11/01/2022
Case Manager / Date Staff Counsel’s Office / Date

SUBJECT: Staff’s Recommendation to Approve Request for Certificate of Convenience and Necessity

DATE: November 1, 2022

CASE BACKGROUND

On August 10, 2022, 188 North Summit, LLC (“188NS”) and Seges Utility Company, LLC (“Seges”) filed a Joint Application and Motion for Waiver (“Application”) with the Missouri Public Service Commission (“Commission”). 188NS seeks the authority to sell, and Seges requests permission to acquire the water and sewer assets 188NS uses to provide service. Additionally, Seges requests to acquire 188NS’ certificates of convenience and necessity (“CCNs”) to operate the systems and provide service to the public. In the alternative, Seges requests that Commission issue it new CCNs authorizing it to own, install, construct, operate, control, manage, and maintain the systems. In the Application, Seges states that it intends to acquire substantially all the water and sewer utility assets presently owned by 188NS for \$1.00.

On August 10, 2022, the co-applicants filed a Motion to Consolidate, and on August 16, 2022, the Commission issued its Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Staff Recommendation (“Order”). The Commission established an initial date of September 29, 2022, by which Staff would file a recommendation or request additional time. Staff filed a status report on September 29, 2022. The Commission established a final date for the Staff Recommendation of October 27, 2022.

The Application was docketed in two separate cases, Case Nos. WM-2023-0065 and SM-2023-0066, which were consolidated by the Commission, with Case No. WM-2023-0065 being designated the lead case. No parties sought to intervene in the case. No public comments have been submitted.

BACKGROUND OF 188NS

188NS is a Missouri corporation, active and in good standing with the Missouri Secretary of State's Office, with its principle office and place of business located at 188 North Summit Drive, Holts Summit, MO 65043. The Commission granted 188NS a CCN to operate the water and sewer assets in an order dated September 19, 2017 in Case No. WM-2018-0018.¹ 188NS currently provides water and sewer services to approximately 55 customers.

BACKGROUND OF SEGES

Seges is a limited liability company, registered and active with the Missouri Secretary of State's Office. Its principle address is P.O. Box 105441, Jefferson City, MO 65110. Seges Mobile Home Park, LLC ("Seges MHP") purchased the mobile home park from 188NS in August 2022.

To the best of Staff's knowledge, Seges has not owned or operated a regulated utility.

STAFF'S INVESTIGATION

Staff conducted a routine site inspection of the water and wastewater systems on October 12, 2021 and no changes to the systems have been reported since this inspection. During this inspection, it was confirmed that there are a maximum of 114 lots available. The mobile home park was originally platted for 147 lots, but not all lots were developed. Staff confirmed that the water distribution and sewer collection systems are in good working condition.

188NS does not own or operate a wastewater treatment facility. The mobile home park originally had a lagoon, but it is now closed. The sewer utility consists of a gravity-flow collection system, which connects to the municipal Holts Summit sewer system, which provides wastewater treatment. The sewer collection system was originally installed in the 1970's with additions in the 1980's. According to the 188NS' 2021 annual report, the gravity sewer collection system consists of approximately 3,900 feet of ten-inch (10") diameter polyvinyl chloride ("PVC") piping. In addition to the 10 inch PVC piping, there is also six-inch (6") diameter clay and PVC pipe and eight-inch (8") diameter PVC pipe, based on past Staff inspections. The original sewer collection system is clay but the newer additions and repairs are PVC.

188NS purchases water from the Public Water Supply District No. 1 of Callaway County ("District"). The District operates and dispenses water under DNR permit MO3024084. The System operates and dispenses water under DNR permit MO2041558. There is a master meter at the entrance to the park to record how much water is being used and how much the District is owed. The master meter is owned by the District and is its responsibility to maintain. Each of the

¹ The owner of the water and sewer systems before 188NS was Seges Partners Mobile Home Park, LLC. The Commission granted Seges Partners Mobile Home Park, LLC CCNs in case number WA-2008-0403. This company has no relation to the prospective purchaser in this case.

mobile homes has its own water meter underneath the skirting so water bills are based on each customer's water usage. Per the 2021 Annual Report, the Company reports that it has 3,000 feet of four-inch (4") PVC pipe of distribution line in the ground.

Per the operator during the last site inspection, unaccounted water loss is not a major concern at this facility. However, recently it was discovered that the wrong shut off valves were installed on many of the homes and vacant lots. Gas valves were installed instead of water valves. These gas valves eventually leaked. All of these improperly installed valves at active homes have been replaced with the proper water valve. During the severe cold of February 2021, pipes of individual homes did freeze, particularly those without a skirt under their homes. At the time of the October 2021 inspection, vacant lots were being winterized and water and sewer connection points were being capped. Besides these operation and maintenance activities, no other major investments have been undertaken. The System is not in need of repairs.

Overall, the water samples have been satisfactory. The last DNR violations occurred in October 2020, but these were due to clerical issues. The last health related violation occurred in 2019.

The parties state in paragraph 20 of the Application, "Seges Utility Co. will utilize the same persons and entities to care for and operate the water and sewer assets as currently used by 188NS." As a result, the current operator, Environmental Management Solutions, LLC, will continue to perform engineering and regulatory duties if Seges' request for a CCN is approved. In addition, the current on-site manager would continue to be employed and handle the billing and administrative tasks for Seges.

During Staff's review of this case, Staff worked with Seges to secure a more legible service area map and legal description. These are attached to this memorandum as Attachment A and Attachment B, respectively.

Publicity and Customer Notice

Residents of the mobile home park received a letter on August 12, 2022, informing them that Seges MHP is the new managing agent.² This letter addresses rent payments, locations residents can pay their rent bill, due date for the rent, acceptable payment methods, grace periods and late payment procedures. The letter did not address the utility company; however, in a meeting between Staff and Seges on October 5, 2022, Seges indicated that it would be open to sending another letter regarding changes related to the utility company.

² Seges' response to Staff's Data Request No. 0006.

Customer Experience

188NS has an onsite office that is staffed Monday through Friday, 9:00 a.m. until 5:00 p.m. Customers are able to contact the management firm via telephone in case of emergency. Seges plans to have an onsite management office that will be staffed Monday, Wednesday and Friday from 9:00 a.m. to 5:00 p.m. Residents will also be able to contact management at all times via telephone.³

Seges will use Rent Manager software, the same software used by 188NS, to track customer information and any customer complaints. 188NS has used a billing system called Zego for calculating (or preparing) customer bills. 188NS sends out water and sewer bills on the 15th of the month and payments are due by the 5th of the next month.⁴

Seges does not plan to use the same billing system and will create its own bills. As before, the bills that customers receive for utility service will also include the mobile home lot rent payment. Bills will be sent out on the 15th of the month and will be due on first of the month. Bills will be considered delinquent 21 days after rendition.⁵ Staff has reviewed Seges' proposed bill and finds it to be in compliance with the rules contained in 20 CSR 4240-13.020. The proposed bill is attached to this Memorandum and marked as Attachment C.

Presently, customers are able to pay online utility bills (as well as their lot rent) through the tenant portal using credit card or electronic funds transfer ("ACH") transaction. Customers are also able to pay via credit card, ACH or cash at Check Free pay locations such as Walmart.⁶ Seges will allow customers to pay by money order or check at the park office or by mail. Customers will also be able to pay online via ACH or credit/debit card.⁷

188NS has a brochure that is currently provided to customers upon move in. Seges has provided Staff with an updated brochure that has been reviewed by Staff and found to be in compliance with the rules contained in 20 CSR 4240-13.040. The proposed brochure is attached to this Memorandum and marked as Attachment D.

Rate and Tariff Matters

Seges proposes to adopt the rates, rules and regulations of 188NS' existing Commission-approved tariff. The Commission granted the original water and sewer CCNs for this mobile home park to Seges Partners Mobile Home Park, LLC ("Seges Partners") in Case No. WA-2008-0403 in an

³ Seges' response to Staff's Data Request No. 0007.

⁴ Seges' response to Staff's Data Request Nos. 0021 and 0022.

⁵ Seges' response to Staff's Data Request No. 0009.

⁶ Seges' response to Staff's Data Request No. 0023.

⁷ Seges' response to Staff's Data Request No. 0011.

order dated August 12, 2009. On September 19, 2017 the Commission granted 188NS and Seges Partners' application for 188NS to purchase the water and sewer assets and acquire these water and sewer CCNs in Case No. WM-2018-0018.

The current water and sewer rates are as follows:

- Water:
 - Monthly Customer Charge: \$12.49
 - Monthly Commodity Charge: \$2.37 for each 1,000gal of metered usage
- Sewer:
 - Monthly Minimum Service Charge: \$32.53
 - Monthly Commodity Charge: \$4.65 for each 1,000gal of metered usage

Financial Analysis

Seges is financially capable to enter into the proposed transaction, because Seges will purchase the water and sewer assets of 188NS for the price of \$1.00.⁸ Currently, Seges has not issued any audited financial statements because it organized on July 14, 2022.⁹ According to Seges' pro forma financial statement, a negative net operation income is projected.¹⁰ However, Seges' financial risk is still low because Seges's capital structure does not include any debts now,¹¹ and Seges has no plan to have any indebtedness because of the proposed transaction.¹² Seges can also file a rate case in the future if it determines that it must raise rates to meet expenses and to avoid net operating loss issues. Therefore, Staff finds that Seges will not have any new financial risks due to the proposed transaction.

Technical, Managerial, and Financial Capacity and Tartan Energy Criteria

Staff utilizes the concepts of Technical, Managerial, and Financial capacities ("TMF") in studying applications involving existing water and/or sewer systems. Staff has reviewed and stated its position on the TMF capacities regarding Seges in the previous CCN and transfer of assets case, in Case No. WA-2008-0403 before the Commission. Staff's position on Seges's ability to meet TMF criteria remains positive regarding those affiliates, and similarly takes the position that Seges has adequate TMF capacity in this case. It is Staff's position that Seges has the ability to secure funding, to oversee construction of any necessary upgrades or repairs, and the ability to successfully manage operations of the Systems.

⁸ Seges' response to Staff's Data Request No. 0003.

⁹ Seges' response to Staff's Data Request No. 0001.

¹⁰ Appendix G-C, Application.

¹¹ Seges' response to Staff's Data Request No. 0005.

¹² Seges' response to Staff's Data Request No. 0004.

When considering a request for a new CCN, the Commission applies criteria originally developed in a CCN case filed by the Tartan Energy Company and referred to now as the “Tartan criteria.” The Tartan criteria contemplate 1) the need for service; 2) the utility’s qualifications; 3) the utility’s financial ability; 4) the economic feasibility of the proposal; and, 5) promotion of the public interest. Similar to the TMF capacities, in previous CCN cases Staff investigated these criteria and that investigation relates to this proposed acquisition. The results of Staff’s investigation are outlined below:

(1) Need for Service

There is both a current and future need for water and sewer service. The existing customer base in the Systems has both a desire and need for service. Additionally, 188NS has sold the mobile home park and no longer wants to operate the water and sewer systems, and there currently are no available alternative service providers.

(2) Applicant’s Qualifications

As previously noted, Seges has never owned a regulated utility. However, according to the Application, Seges plans to utilize the same persons and entities to care for and operate the water and sewer assets as currently employed by 188NS. This includes the same onsite management personnel responsible for administrative duties and customer billing, as well as the same certified operator in charge of operations and technical support related to infrastructure and distribution. Further, Seges will continue to use the current office that 188NS utilizes.

(3) Applicant’s Financial Ability

Seges requires no external financing to complete this acquisition. Although Seges’ Balance Sheet and Income Statement (Appendix G-C to the Application) shows Seges having a negative operating income, Seges states that it plans to offset the income loss from the water and sewer systems with park lot rents. Additionally, as stated above, Seges can file a rate case in the future if it determines that it must raise rates to meet expenses and to avoid net operating loss issues.

(4) Feasibility of the Proposal

As noted in the Financial Analysis section of this Memorandum, Seges has a low risk financial profile, as Seges does not currently contain any debt related to its capital structure and Seges has no indebtedness related to this transaction.

(5) Promotion of the Public Interest

Because 188NS currently provides service to these water and sewer customers, there is an obvious need for this service. Approval of this request for a CCN will result in promotion of the public interest, as the public is in need of current and future service, and there currently are no alternative providers in the area. Both the City of Holts Summit and the local Public Water Supply District

have declined to provide service to the residents of the Mobile Home Park. Seges has the financial ability to purchase the Systems and operate it safely.

OTHER ISSUES

188NS and Seges request a waiver of the Feasibility Study requirement, per 20 CSR 4240-3.600(1)(A)2. Staff is not opposed to waiving the Feasibility Study requirement, based on the following information gathered during Staff's investigation:

- 1) Seges having a low risk financial profile;
- 2) Seges having no current debt related to its capital structure nor any indebtedness as a result of this transaction;
- 3) During the meeting between Staff and Seges on October 5, 2022, Seges informed Staff, there are no perceived immediate repairs or improvement costs necessary for the System; there are no plans by either the Public Water Supply District or the City of Holts Summit to alter current water and/or sewer rates; and any negative net operating balance will be offset by operation of the mobile home park itself in the form of revenues incurred via pad rent and mobile home and/or lot sales;
- 4) Seges can file a rate case in the future if it determines that it must raise rates to meet expenses and to avoid net operating loss issues;
- 5) This transfer of assets being the result of the mobile home park itself being sold; and
- 6) The fact most of the current onsite management and operation personnel will remain after the transfer, thus ensuring the continuance of safe and adequate service.

At the time of filing its Application, 188NS Seges did not provide a list of ten (10) resident's names and addresses. The parties provided a list of ten (10) residents to Staff via an email, dated October 10, 2022 and is included as Attachment E to this Memorandum.

Neither Seges nor 188NS have other pending cases before the Commission.

STAFF RECOMMENDATION

Staff recommends the Commission find that Seges has complied with the requirements of Section 393.320, RSMo, and approve Seges' request for CCN, subject to the following conditions and actions:

1. Cancel the current CCN held by 188NS and grant Seges a CCN, in order to provide water and sewer service in the proposed Systems service area;
2. Approve existing Systems water and sewer rates for the Systems;
3. Authorize Seges to provide service under the water and sewer tariffs presently on file for 188NS, P.C.S Mo No. 1 and 2, on an interim basis, until Adoption Notice tariff sheets become effective;

4. Require Seges to adopt 188NS tariffs by filing Adoption Notice tariff sheets, one each for the water tariff and the sewer tariff, with 30-day effective dates, within ten (10) days after closing on the assets;
5. Require Seges to notify the Commission of closing on the assets within five (5) days after such closing;
6. If closing on the water and sewer system assets does not take place within thirty (30) days following the effective date of the Commission's order approving such, require Seges to submit a status report within five (5) days after this thirty (30) day period regarding the status of closing, and additional status reports within five (5) days after each additional thirty (30) day period, until closing takes place, or until Seges determines that the transfer of the assets will not occur;
7. If Seges determines that a transfer of the assets will not occur, require Seges to notify the Commission of such no later than the date of the next status report, as addressed above, after such determination is made, and require Seges to submit tariff sheets as appropriate that would cancel service area maps and descriptions applicable to the Systems service area in its water and sewer tariffs, and rate and charges sheets applicable to customers in the Systems service area in both the water and sewer tariffs;
8. Require Seges to keep its financial books and records for plant-in-service and operating expenses in accordance with the NARUC Uniform System of Accounts;
9. Approve 188NS' current water and sewer utility plant depreciation schedules, which are attached to this document as Exhibit F;¹³
10. Require Seges to provide to the CXD Staff an example of its actual communication with the Systems customers regarding its acquisition and operations of the water system assets, and how customers may reach Seges, within ten (10) days after closing on the assets;
11. Require Seges to provide to the CXD Staff a sample of five (5) billing statements from the first month's billing within thirty (30) days after closing on the assets;
12. Require Seges to file notice in this case outlining completion of the above recommended customer communications and notifications within ten (10) days after such communications and notifications.

¹³ These rates were established in the case granting CCNs to Seges Partners Mobile Home Park, LLC, which was the owner of the mobile home park before 188NS. *Order Granting Certificates of Convenience and Necessity*, WA-2008-0403 and SA-2009-0401, August 12, 2009. 188NS was ordered to follow these same depreciation rates. *Order Granting Certificates of Convenience and Necessity and Granting Waiver*, SM-2008-0017 and WM-2018-0018, September 19, 2017.

ATTACHMENTS:

- A. Service Area Map
- B. Legal Description
- C. Proposed Customer Bill
- D. Proposed Customer Brochure
- E. Seges Mobile Home Park, LLC Resident List
- F. Depreciation Rates

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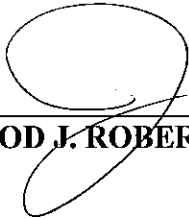
Case No. WM-2023-0065

AFFIDAVIT OF JARROD J. ROBERTSON

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW JARROD J. ROBERTSON and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

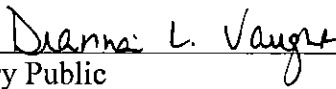


JARROD J. ROBERTSON

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of October, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377



Notary Public

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Case No. WM-2023-0065

AFFIDAVIT OF DARONN A. WILLIAMS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

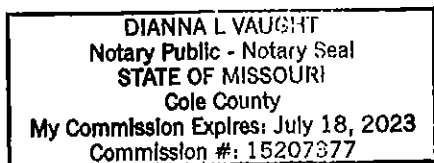
COMES NOW DARONN A. WILLIAMS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Daronn A. Williams
DARONN A. WILLIAMS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of October, 2022.



Dianna L. Vaught
Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

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Case No. WM-2023-0065

AFFIDAVIT OF DEBORAH ANN BERNSEN

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW DEBORAH ANN BERNSEN, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

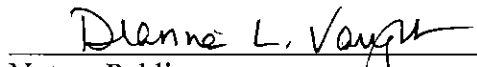
Further the Affiant sayeth not.


DEBORAH ANN BERNSEN

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27th day of October, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377


Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
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188 North Summit, LLC, and Seges)
Utility Company, LLC For Authority to)
Sell the Water System and Wastewater)
System Assets of Seges Mobile Home)
Park, LLC, to Seges Utility Company,)
LLC, and For a Certificate of)
Convenience and Necessity to Provide
Water and Sewer Services

Case No. WM-2023-0065

AFFIDAVIT OF SARAH FONTAINE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SARAH FONTAINE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

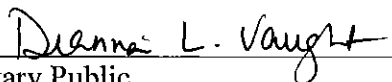


SARAH FONTAINE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 26th day of October, 2022.

DIANNA L VAUGHT
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: July 18, 2023
Commission #: 15207377



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)
188 North Summit, LLC, and Seges)
Utility Company, LLC For Authority to)
Sell the Water System and Wastewater)
System Assets of Seges Mobile Home)
Park, LLC, to Seges Utility Company,)
LLC, and For a Certificate of)
Convenience and Necessity to Provide)
Water and Sewer Services)

Case No. WM-2023-0065

AFFIDAVIT OF SEOUNG JOUN WON, PhD

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW SEOUNG JOUN WON, PhD, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

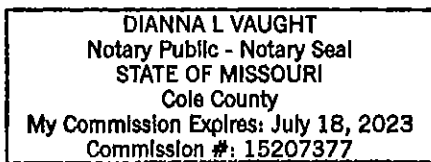
Further the Affiant sayeth not.

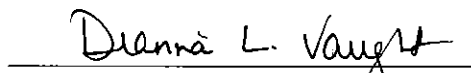


SEOUNG JOUN WON, PhD

JURAT

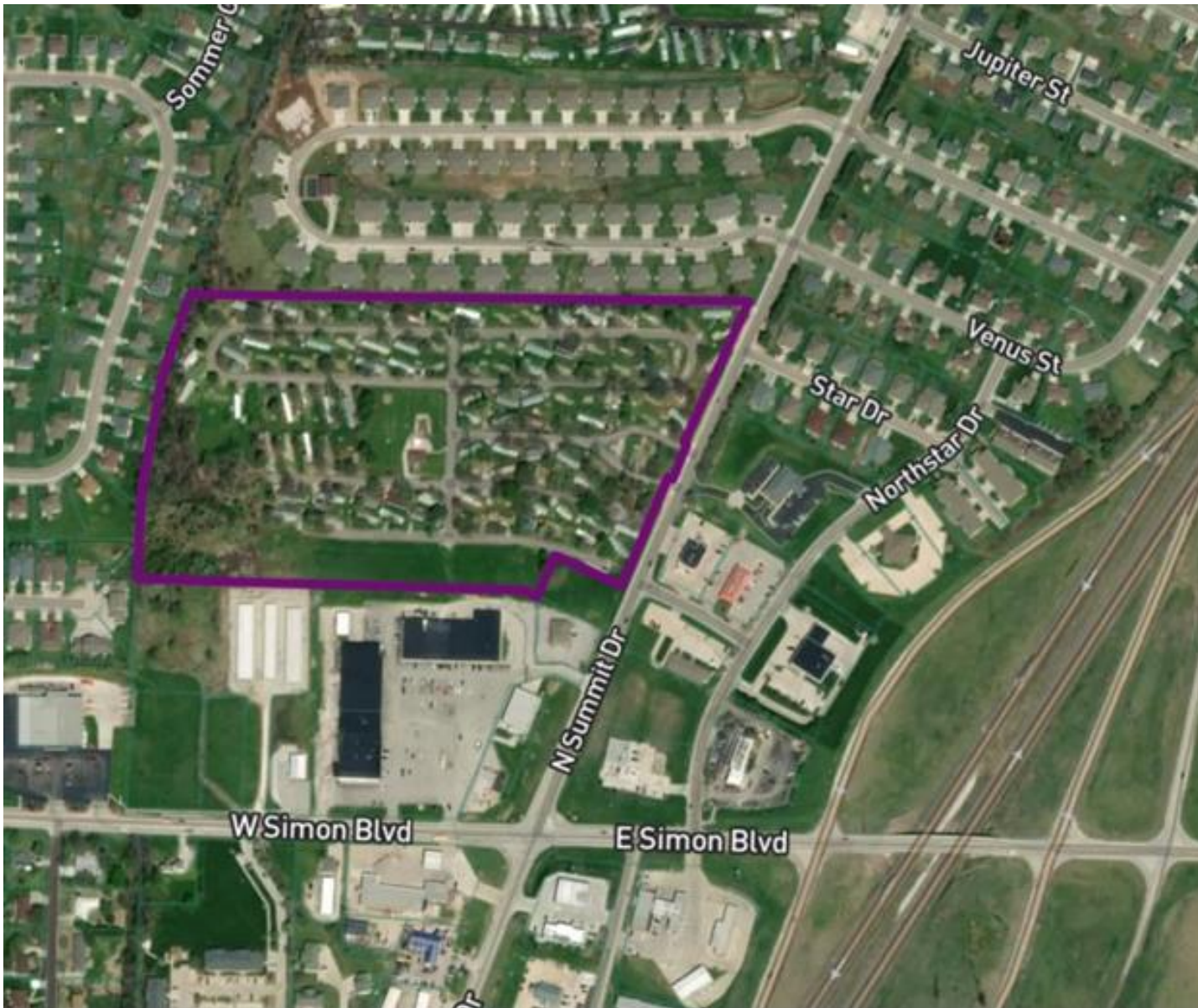
Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 27th day of October, 2022.





Notary Public

Attachment A



Seges Utility Company, LLC's Certificate Area

Attachment B

Part of Section Twenty-four (24), Township Forty-five (45) North, Range Eleven (11) West, Callaway County, Missouri, described as follows:

Commencing at a 3-1/4 inch aluminum monument for the East Quarter corner of said Section 24, (reference S.R.B. Q, page 214); thence South 84° 04' 00" West, 1051.70 feet to a 1/2 inch iron pin on the West Right-of-way of old U.S. Highway 54; thence continue South 84° 04' 00" West to an iron pin, (reference S.R.B. 2, page 180); thence South 12° 56' 58" West, 1001.13 feet to a 1/2 inch iron pin; thence South 11° 38' 58" West, 370.55 feet to a 1/2 inch iron pin and the true POINT OF BEGINNING; thence continue South 11° 38' 58" West, 226.60 feet to a 1/2 inch iron pin; thence South 4° 19' 45" West, 303.50 feet to a 1/2 inch iron pin; thence South 5° 54' 09" East, 158.70 feet; thence continue South 5° 54' 09" East, 85.02 feet; thence North 84° 11' 12" East, 479.69 feet to an iron pin; thence North 84° 22' 39" East, 554.76 feet to a 1/2 inch iron pin; thence South 72° 14' 57" East, 227.51 feet to an iron pin on the West Right-of-way of old U.S. Highway 54; thence North 15° 42' 32" East, along said Right-of-way, 117.00 feet to a point hereinafter referred to as "POINT A"; thence continuing North 15° 42' 32" East, along said Right-of-way 64.40 feet to an iron pin; thence North 16° 30' 04" East, 252.83 feet; thence South 73° 20' 56" East, along said Right-of-way, 10.00 feet; thence North 16° 30' 04" East, along said Right-of-way, 100.00 feet; thence North 16° 30' 04" East, along said Right-of-way, 100.00 feet; thence North 73° 29' 56" West, along said Right-of-way, 10.00 feet; thence North 17° 37' 32" East, along said Right-of-way line, 410.93 feet to a 1/2 inch iron pin; thence leaving said Right-of-way, South 83° 15' 13" West, 1487.30 feet to the true POINT OF BEGINNING.

EXCEPTING THEREFROM Part of the South Half of Section 24, Township 45 North, Range 11 West, Callaway County, Missouri, described as follows: Commencing at a 3-1/4 inch Aluminum Monument for the East Quarter Corner of said Section 24 (ref. Survey Record Book Q, page 214); thence South 84° 04' 00" West, 1051.70 feet to a 1/2 inch iron pin on the West Right-of-way line of Old U.S. Highway 54; thence continue South 84° 04' 00" West, 1649.52 feet to an iron pin; reference Survey Record Book 2, Page 180; thence South 12° 56' 58" West, 1001.13 feet to a 1/2

inch iron pin; thence South 11° 38' 58" West, 597.15 feet to a 1/2 inch iron pin; thence South 4° 19' 45" West, 303.50 feet to a 1/2 inch iron pin; thence South 5° 54' 09" East, 243.72 feet to a 1/2 inch iron pin; thence North 84° 11' 12" East, 479.69 feet to an iron pin; thence North 84° 22' 39" East, 554.76 feet to a 1/2 inch iron pin; thence South 72° 14' 57" East, 33.51 feet to the true POINT OF BEGINNING; thence continue South 72° 14' 57" East, 194.00 feet to an iron pin on the West Right-of-way line of Old U.S. Highway 54; thence North 15° 42' 32" East, along said Right-of-way line, 117.00 feet to a point; thence leaving said Right-of-way line, North 72° 14' 57" West, 194.00 feet to a point; thence South 15° 42' 32" West, 117.00 feet to the true POINT OF BEGINNING.

SUBJECT to easements of record.

ALSO including all of Grantor's non-exclusiveright, title and interest in and to a 31 foot wide non-exclusive roadway and utility easement, the Southerly line being described as follows: Commencing at the above mentioned "POINT A", the POINT OF BEGINNING of the Southerly line of this 31 foot wide easement; thence North 72° 14' 57" West, 194.00 feet to the POINT OF TERMINATION of this easement.

Attachment C

Seges MHP, LLC.

Statement

PO Box 105441
Jefferson City, MO 65110

Billing Period	Statement Date
11/01/22 - 11/30/22	10/13/22

TO:

Weinrich, Alan
188 N Summit Drive
Lot 3
Holts Summit, MO 65043

Property	Unit	Type	Acc #
SE	3	Lot	1564

Previous Balance	Current Charges	Current Credits	Balance Due
0.00	347.33	0.00	347.33



Last Payment	Amount Enclosed
10/5/22 \$345.02 Auto Pay CHK	

PLEASE RETURN TOP PORTION WITH YOUR REMITTANCE

Date	Reference	Description	Amount
11/01/22		Previous Balance	0.00
11/01/22	Readings:	Water Utility 9/4-10/3 Water Readings <i>Current: 10/15/22 - 118250 Previous: 09/15/22 - 117920 Usage: 330</i>	13.27
11/01/22	Readings:	Sewer 9/4-10/3 Readings <i>Current: 10/15/22 - 118250 Previous: 09/15/22 - 117920 Usage: 330</i>	34.06
11/01/22		Lot Rent Charge November Rent	300.00

Sub Total	347.33
Unapplied Credits	0.00
Balance Due	347.33

Comments

Payments are due 11/1/2022.

Please pay no later than 11/5/2022 to avoid late fees. Checks and Money Orders made payable to "Seges MHP, LLC." can be mailed to PO Box 105441 Jefferson City, MO 65110 or placed in the office drop box. Please make sure your name and lot number are clearly marked on your rent payment. We also have an online account option where you can pay by credit/debit card or ACH, if interested in an online option please email bookkeepingmhp@gmail.com.

Sewer Base Fee: \$32.53
Sewer Rate: \$4.65/1000 Gallons
Water Base Fee: \$12.49
Water Rate: \$2.37/1000 Gallons

Any questions contact Mary at (573) 340-5810 Ext 708
Emergency #: (573) 896-0195
Thank you!

Attachment D

Seges Utility Company, LLC. is regulated by the Missouri Public Service Commission.

This information is being provided in accordance with 20 CSR 4240-13.040, which are rules of the Missouri Public Service Commission which regulate investor owned utilities.

The customer has a right under procedures in 20 CSR 4240-13.070 to file a formal or informal complaint with the Missouri Public Service Commission. If you have an inquiry, billing question or service-related problem that your utility provider cannot answer, please contact the PSC at P.O. Box 360, Jefferson City, MO 65102-0360, call toll free at 1-800-392-4211 or visit the PSC website at www.psc.mo.gov.

The Office of the Public Counsel represents the interest of utility consumers in proceedings before the Missouri Public Service Commission. You may contact them by mail at P.O. Box 2230, Jefferson City, MO 65102-2230, by toll free telephone at 1-866-922-2959 or visit the OPC website at opc.mo.gov.

Seges Utility Company, LLC.

Seges MHP, LLC.



**188 N Summit Drive
Holts Summit, MO 65043**

(573) 896-0195

segesmhp LLC@gmail.com

Payment Options

Payment deadline:

Payments are due on the 1st of the month. Bills are considered delinquent 21 days after the bill is rendered and may incur a late fee as of this date.

Accepted payment options:

We accept checks or money orders by mail, at the park office, or payment may be made online via ACH or credit card. There are processing fees associated with the ACH and credit/debit card payment options. If interested in the online payment option, email bookkeepingmhp@gmail.com.

Payments shall be made at the office, sent by first class mail or online.

Office address:

188 N Summit Drive
Holts Summit, MO 65043

Payment mailing address:

PO Box 105441
Jefferson City, MO 65110

If you leave your residence for an extended period of time please consider forwarding your mail or contacting the Company in advance to avoid service disconnection.

Disconnection of Service

Seges Utility Company, LLC. may shut off service due to non-payment of utility bills or violations of any rules and regulations listed in the tariff. Customers will be given at least 10 days notice of disconnect if notice is sent by mail. If written notice is hand delivered to the Customer, it shall be done at least ninety-six (96) hours prior to discontinuance.

Deposits

The Company may require a security deposit that will not exceed utility charges of one billing period. plus 30 days on estimated or actual usage.

Water & Sewer Service:

Monthly Rates

Residential Minimum Monthly Water Charge: \$12.49
Water Usage Charge: \$2.37 for each 1,000 gallons of metered water usage

Residential Minimum Monthly Sewer Charge: \$32.53
Water Usage Charge: \$4.65 for each 1,000 gallons of metered water usage

Late Charges: \$5.00

Returned Check Charge:

A returned check charge of \$30.00 per check will be paid by customers on all checks returned from the bank.

Disconnect/Reconnection Charge

Turn-on/reconnection fee: \$50.00

Turn-off/disconnect fee: \$25.00

A \$15.00 charge will be added to the current bill if the Company personnel is on-site to disconnect the service when the Customer pays the bill. The disconnection fee may not be assessed if the service is not physically disconnected.

Meter Test Fee

\$50.00

Reading Meters for Accurate Bills

Seges Utility Company, LLC. makes every effort to obtain an actual meter reading as the most accurate way to calculate your bill. However, there are times when we may have to estimate usage. For example, adverse weather may prevent meter readings.

When it is necessary to estimate usage, Seges Utility Company, LLC. will comply with the bill estimation procedures prescribed by Missouri Public Service Commission rules 20 CSR 4240-13-020(2)(C).

The difference between the estimated bill and your actual usage will be automatically adjusted on your bill following the next actual meter reading.

How to Read Your Water Meter

Generally, outdoor meters should not be opened, as they are sometimes difficult to re-seal properly. If you want to read your meter, you will find a numerical odometer type meter (similar to the device that records miles traveled in a car).

The odometer-type meter readings show the Gallons used with a series of numbers in a small window. You can calculate the difference between readings to determine the number of gallons used. Your bill shows usage in terms of gallons.

This illustration depicts an odometer-type meter with a reading of 2560.00 gallons.

002560.00

Attachment E

Resident	Address
Alan Weinrich	188 N Summit Drive Lot 3 Holts Summit, MO 65043
Donna Kelley	188 N Summit Drive Lot 4 Holts Summit, MO 65043
Mary Plexico	188 N Summit Drive Lot 9 Holts Summit, MO 65043
Ricky Martin	188 N Summit Drive Lot 11 Holts Summit, MO 65043
Eva Jamison	188 N Summit Drive Lot 30 Holts Summit, MO 65043
Brandy Fowler	188 N Summit Drive Lot 45 Holts Summit, MO 65043
Jamie Dailey	188 N Summit Drive Lot 77 Holts Summit, MO 65043
Dillon Geiger	188 N Summit Drive Lot 94 Holts Summit, MO 65043
Sandra White	188 N Summit Drive Lot 118 Holts Summit, MO 65043
Howard Smith	188 N Summit Drive Lot 144 Holts Summit, MO 65043

Seges Partners Mobile Home Park, L.L.C.

DEPRECIATION RATES

(WATER)

WA-2008-0403

ACCOUNT NUMBER	ACCOUNT DESCRIPTION	DEPRECIATION RATE	AVERAGE SERVICE LIFE (YEARS)	NET SALVAGE
343	Transmission & Distribution Mains	2.0%	50	
345	Services	2.5%	40	
346	Meters	10.0%	10	

Seges Partners Mobile Home Park L.L.C.

DEPRECIATION RATES

(SEWER)

SA-2009-0401

ACCOUNT NUMBER	ACCOUNT DESCRIPTION	DEPRECIATION RATE	AVERAGE SERVICE LIFE (YEARS)	NET SALVAGE
352.2	Collection Sewers (Gravity)	2.0%	50	0%
354	Services	2.0%	50	0%