

In the Matter of the Application of
Hickory Hills Water & Sewer Co., Inc.,
the Staff of the Missouri Public
Service Commission, and the
Office of the Public Counsel for
Approval of Their Unanimous
Stipulation and Consent Order for
Appointment of Interim Receiver
and Order to General Counsel to
Petition the Circuit Court of
Cole County for the Appointment
of a Receiver.

OFFICE OF THE PUBLIC COUNSEL’S
RESPONSE TO THE QUESTIONS OF THE COMMISSION

The Missouri Public Service Commission conducted an on-the-record presentation in this case on July 31, 2006, and directed the Office of the Public Counsel to address Commission questions regarding the Unanimous Stipulation and Consent Order for Appointment of Interim Receiver and Order to General Counsel to Petition the Circuit Court of Cole County for the Appointment of a Receiver filed in this case. In response to the Commission's questions, Public Counsel submits the following answers:

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- 4) What qualifications will you require a receiver or operator to have?
Answer: Public Counsel would expect the qualifications that satisfy DNR operator regulations.
- 5) Will the receiver or operator need more than a high school education?
Answer: The answer depends on the qualifications that satisfy DNR operator regulations.
- 6) Will the receiver or operator need technical training?
Answer: The answer depends on the qualifications that satisfy DNR operator regulations.
- 7) Will the utility need to pay for any required training?
Answer: The answer is unknown to Public Counsel at this time.
- 8) Will the operational person be available 24 hours a day, seven days a week?
Answer: Public Counsel believes that the person should be available during that time.
- 9) Where will the operational person be based?
Answer: The answer is unknown to Public Counsel at this time.
- 10) What mileage arrangements do you expect?
Answer: Any mileage arrangements in excess of the mileage already included in the rates approved by the Commission in the rate case, if any, is unknown and is not anticipated by Public Counsel.
- How much time will the operational person need to put in per week?
Answer: Please reference the rate case for the Public Counsel's estimate of the time it takes to operate the systems.
- 12) Will it be an hourly or salaried position?
Answer: The answer is unknown to Public Counsel at this time.
- 13) What wage rate will be required to attract and maintain the operational person?
Answer: Please reference the rate case for the Public Counsel's estimate of the costs it takes to operate the systems.
- 14) If needed, will the Public Counsel support a rate increase to fund this position?
Answer: Public Counsel will not support such a rate increase if it is above that amount which the Commission approved in the rate case; the approved rates have not yet been implemented.

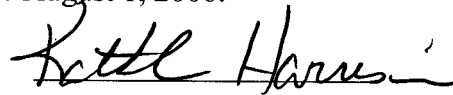
- 15) Has Mr. Cover agreed to accept appointment as receiver?
Answer: Public Counsel understands that he has, but has no first hand knowledge of that and, therefore, cannot answer with certainty.
- 16) If Mr. Cover has agreed to accept appointment has he specified his fees?
Answer: The answer is unknown to Public Counsel at this time.
- 17) Will Public Counsel support a rate increase, if needed, to fund the administrative functions of the receiver?
Answer: No. Public Counsel will not support such a rate increase if it is above that amount which the Commission approved in the rate case; the approved rates have not yet been implemented.

Comes now Ted Robertson, CPA, Public Utility Accountant, Office of the Public Counsel, being of lawful age and first having been duly sworn states that the answers set forth in this Response to Commission Questions are true and correct to the best of his information, knowledge, and belief.


Ted Robertson CPA

Sworn to and subscribed before me a notary public August 1, 2006.





Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ **Michael F. Dandino**

BY: _____
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to Counsel of Record, this August 1, 2006.

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/s/ Michael F. Dandino

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