

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

In the Matter of the Joint Application of Algonquin )	
Water Resources of Missouri, LLC, d/b/a Liberty )	
Water for Authority for Liberty Water to Acquire )	File No. WO-2011-0328
Certain Assets of Noel Water Co., Inc. and, in )	
Connection Therewith, Certain Other Related )	
Transactions. )	

**THE OFFICE OF THE PUBLIC COUNSEL’S RESPONSE**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response states as follows:

1. On April 6, 2011, Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water (Liberty Water) and Noel Water Co., Inc. (Noel) filed with the Missouri Public Service Commission (Commission) a *Joint Application and, if Necessary, Motion for Waiver*, seeking authority for Liberty Water to acquire certain assets of Noel.
2. On July 25, 2011, the Staff of the Missouri Public Service Commission (Staff) filed its *Staff Recommendation*.
2. On August 3, 2011, *Staff’s Amended Recommendation* was filed stating that this amended recommendation was filed to more accurately reflect Liberty Water’s anticipated plans regarding the call center, and that beyond that change the substance and outcome of Staff’s July 20, 2011 recommendation remains the same.
3. Public Counsel has reviewed the *Staff Recommendation* and *Staff’s Amended Recommendation* with the Amended Official Case File Memorandum attached as Appendix A and now states that it has no objection to Staff’s recommendations. Additionally, Public Counsel states that it agrees with Staff’s determination that Noel has a total rate base on a consolidated

basis in the amount of \$747,009 as of May 31, 2011, and that this amount reflects the starting point for the determination of rate base to be used for regulatory purposes in the next rate case.

(Appendix A, Amended Official Case File Memorandum, Pages 6 & 7)

**WHEREFORE,** Public Counsel respectfully submits its Response.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/s/ Christina L. Baker**

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 4<sup>th</sup> day of August 2011:

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