

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

In the Matter of the Application of Missouri-American)
Water Company for a Certificate of Convenience and)
Necessity Authorizing it to Install, Own, Acquire,)
Construct, Operate, Control, Manage and Maintain a)
Water System and Sewer System in and Around the)
City of Eureka, Missouri)

Case No. WA-2021-0376

SUPPLEMENTAL FILING

COMES NOW Staff of the Missouri Public Service Commission (Staff), through counsel, and files this *Supplemental Filing* in response to the Commission’s April 29, 2022 *Order Directing Staff to Supplement Filing*.

1. On April 11, 2022, Staff requested that the Commission reopen the record to further develop evidence whether residents of the Arbors of Rockwood subdivision will pay twice for the water system serving their subdivision if the sale of the City of Eureka’s water system to MAWC is completed.

2. On April 21, 2022, the Commission granted Staff’s request and ordered an evidentiary hearing be held May 5, 2022. On April 26, 2022 the Commission rescheduled this hearing for May 6, 2022.

3. On April 29, 2022, the Commission ordered Staff to file the development agreement between the City of Eureka, the Arbors of Rockwood Community Improvement District (Arbors CID), and the developer.

4. Staff does not have the development agreement at this time. Staff has subpoenaed Craig Sabo, City of Eureka administrator and an Arbors CID director, to appear at the hearing. Mr. Sabo is to bring a copy of this development agreement.

See the attached *Subpoena* and *Attachment to Subpoena Duces Tecum, Documents to Bring to Evidentiary Hearing on May 6, 2022.*

WHEREFORE, Staff files this *Supplemental Filing* for the Commission's information and consideration.

Respectfully submitted,

/s/ Karen E. Bretz

Karen E. Bretz

Deputy Director

Missouri Bar No. 70632

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5472 (Voice)

573-751-9285 (Fax)

Karen.Bretz@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 2nd day of May, 2022.

/s/ Karen E. Bretz

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**ATTACHMENT TO SUBPOENA DUCES TECUM
DOCUMENTS TO BRING TO EVIDENTIARY HEARING ON MAY 6, 2022**

1. Ordinance 2394 passed by the City of Eureka's Board of Aldermen on October 18, 2016.
2. All resolutions passed by the Arbors of Rockwood Community Improvement District (Arbors CID).
3. Development Agreement between the City of Eureka, the Arbors of Rockwood Community Improvement District, and Brewster Road, LLC entered into on or around February 22, 2017.
4. All receipts and financial records related to the water system at the Arbors of Rockwood subdivision, to include ledgers, invoices, receipts, and images of cancelled checks.