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, 2002, 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,

Is/ Karen E. Bretz

Karen E. Bretz
Deputy Director
Missouri Bar No. 70632
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Missouri Public Service Commission
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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



State of Missouri Public Service Commission

	SU	JBPOENA			
	(order to appear and testify at heari		or bring docu	ıments, oı	r both)
(Style of Action)	(62.002.00.00)	ė.		(File No.)	
Convenience and Ner	oplication of Missouri-American Water Cocestiy Authorizing it to Install, Own,, Ac Maintain a Water System and Sewer Sy	quire, Construct, 🤇)perate,	WA-202	1-0376
State of Missouri to	:				
Person to Be	(Name)	(Address)			
Served	Craig Sabo	100 City Hall Drive, Eureka, MO 63025			
Requesting Party	প্রিল্লা of the Missouri Public Service Commission	(Address) Governor Office Building, 200 Madison St., Jefferson City, MO 65101			
Requesting Party's Attorney	(Name) Karen Bretz	Governor Office Building, 200 Madon St., Jefferson City, MO (573) 751-5472			
You are hereby con	nmanded to:				
Appear at	উপিছানিতা Office Building, 200 Madisor Jefferson City, MO 65101	n St., Room 310,	St., Room 310, (Date) May 6, 2022		(Time) 8:30 AM
Contact	(Name)	, at (Telephone	, who will act to appear.		vill advise of the time and place arr.
Testify on	Start of the Missouri Public Service	(Address)			
behalf of	Commission	Governor Office	Building, 20	n St., Jefferson City, MO 65101	
Give deposition	s.				<u> </u>
☑ Bring the	(Documents; attach extra page if needed)				
following.	Please see attached.			<u> </u>	
Secretary, Commiss	Wooded) Secretary ioner, or Regulatory Law Judge			-	
	(must be signed in the presence	Return	served by a	neace off	icer)
On the 28th day			<u> </u>	<u> </u>	
Delive Leavin or Mailin	son to be served with a copy of this sub gring to that person; or ag at the dwelling place or usual place of ag by first class mail in a sealed envelop allowing other method allowed by law:	f abode with a me	mber of that		
Non est.	R. Harmon		s R.H		۲۱۵
Process Server's S	Signature	Process Serve	r's Printed	Name	
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U				Comr	mission Number 21449302

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City of Eureka, Missouri).

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.