

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. WA-2023-0092 & SA-2023-0093
Confluence Rivers Utility Operating Company, Inc.

FROM: Amanda C. McMellen – Auditing Department
Sarah Fontaine – Customer Experience Department
Amanda Coffey – Engineering Analysis Department
Keri Roth – Water, Sewer & Steam Department
Daronn A. Williams – Water, Sewer & Steam Department

/s/ Keri Roth 12/22/2022 /s/ Eric Vandergriff 12/22/2022
Senior Research/Data Analyst / Date Staff Counsel’s Office / Date

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

DATE: December 22, 2022

Case Background

On September 9, 2022, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) filed an *Application and Motion for Waiver* (“Application”) with the Missouri Public Service Commission (“Commission”) requesting a Certificate of Convenience and Necessity (“CCN”) authorizing it to install, own, acquire, construct, operate, control, manage, and maintain the water and sewer system assets currently owned by Stone Ridge Meadows Home Owners Association, Inc. (“Stone Ridge”) in St. Charles County, Missouri. These systems are currently unregulated. Confluence Rivers proposes to acquire all or substantially all of the water and sewer system assets for an agreed upon purchase price of ** [REDACTED] **.

The Application was docketed in two separate cases, Case Nos. WA-2023-0092 and SA-2023-0093. On September 9, 2022, Confluence Rivers filed a *Motion to Consolidate*, and on September 15, 2022, the Commission issued its *Order Granting Motion to Consolidate*, with Case No. WA-2023-0092 being designated the lead case. On September 15, 2022, the Commission issued its *Order Directing Notice, Setting Deadlines for Intervention, and Directing Staff Recommendation* to be filed or additional time requested by October 31, 2022. On October 31, 2022, Staff filed its *Request for Additional Time to File Staff Recommendation*, requesting additional time to file its recommendation by November 30, 2022. Staff filed a *Second Request for Additional Time to File Staff Recommendation*, requesting to file the recommendation no later than December 22, 2022.

Confluence Rivers has no overdue Commission annual reports or assessment fees. Additionally, no parties sought to intervene in the case, and to date, no public comments have been submitted.

Background of Confluence Rivers Utility Operating Company, Inc.

Confluence Rivers is a regulated water and sewer utility currently providing service in Missouri. Confluence Rivers is a subsidiary of Central States Water Resources, LLC (“CSWR”), which also owns and operates several other water and sewer companies in Missouri, as well as several other operating companies in several other states. In its Application, Confluence Rivers states it currently provide water service to approximately 4,400 customers and sewer service to approximately 4,600 Missouri customers in several counties.

Background of Stone Ridge

Stone Ridge is a Missouri nonprofit corporation in good standing with the Missouri Secretary of State. Stone Ridge provides water and sewer service to approximately 18 residential customers in St. Charles County, Missouri, all of which are single-family homes. Stone Ridge does not presently separately charge for water and sewer service; water and sewer charges are included in the quarterly homeowner’s association fee.

Staff’s Investigation

Water System Background

Stone Ridge is a community public water system (“PWS”) requiring an operator with a Distribution I certification. Stone Ridge has a ground water system with one well and one 5,000-gallon hydropneumatic tank. The well was installed on July 13, 2006, and has a total depth of 1,425 feet. It has a casing diameter of eight inches and a casing depth of 425 feet. The well has a pump capacity of 150 gallons per minute. The system’s hydropneumatic tank is located inside a building near 117 Stone Ridge Meadows Drive in O’Fallon, Missouri, and the well head is located outside of the building on the side of the residential street at 112 Stone Ridge Meadows Drive in O’Fallon, Missouri. The water system operates under the Missouri Department of Natural Resources (“DNR”) PWS ID Number MO6031488.

Confluence Rivers’ application mistakenly states in paragraph 7 that the water system is treated with sodium hypochlorite for disinfection. The system is currently not equipped with a disinfection process nor has a back-up generator, which means water could run out during power outages.

The water distribution lines consists of six inch polyvinyl chloride (“PVC”) pipe. The water system is currently unmetered. Per an e-mail from Confluence Rivers, upon ownership, they will develop a long-term plan to install meters for these customers. A meter installation plan is not included in

the initial improvements due to the cost per customer, but Confluence Rivers has told Staff it is their goal to get meters installed at a pace that recognizes the customer rate impact.

The water system has a history of exceeding the maximum contaminant level (“MCL”) of 5 picocuries per liter (pCi/l) for the combination of radium-226 and radium-228. These radium particles, which are a type of radionuclides, are a natural part of the environment, and small amounts of radium are common in the air, water, and soil in some areas in Missouri. The MCLs are established to protect public health, because long-term consumption of radionuclides in water can cause cancer or other health effects.

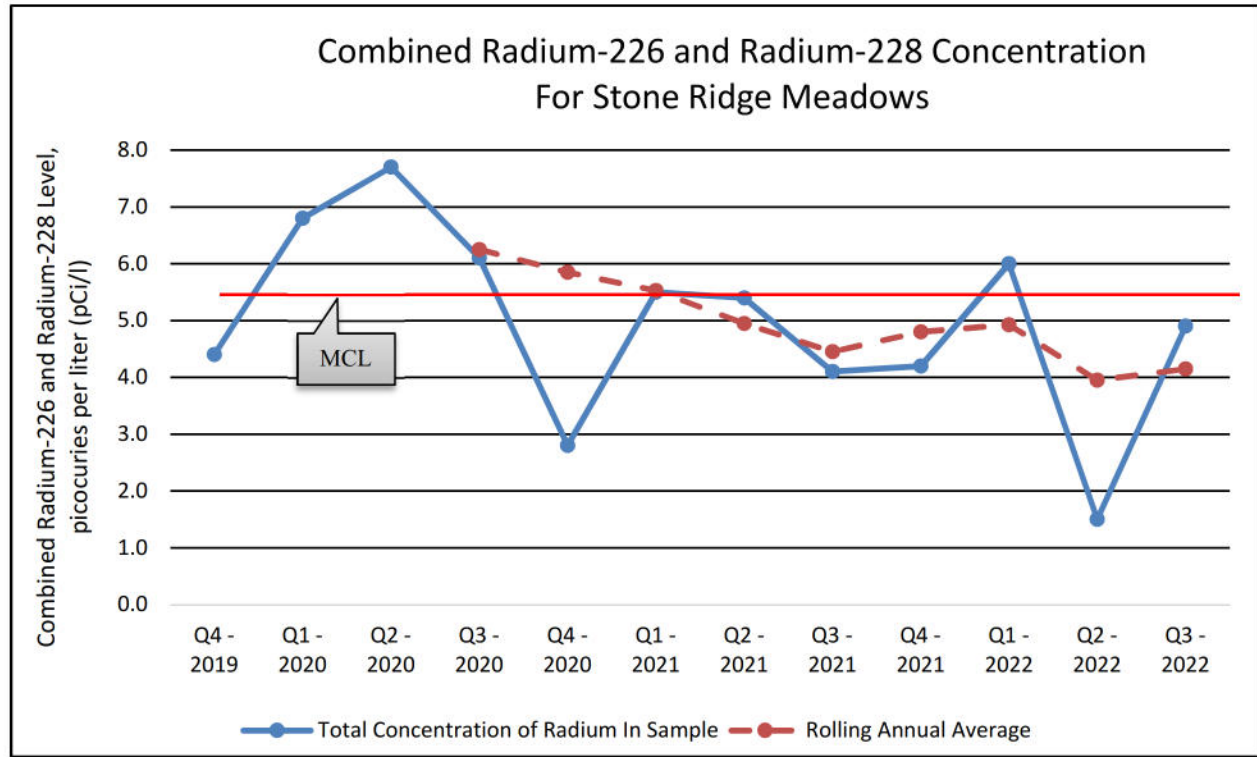
DNR issued Notices of Violations to Stone Ridge for this issue on December 3, 2020, March 24, and May 17, 2021. As a result of Stone Ridge’s continued exceedances of radium-226 and radium-228, DNR issued Administrative Order on Consent (“AOC”) Order Number PDWB-2022-190 on April 22, 2022. DNR uses a rolling annual average of combined radium-226 and radium-228 to determine if a water system is in compliance to the MCL of 5 pCi/l. This MCL is found in 10 CSR 60-4.060(1)(A).

Stone Ridge became a public water supply source in 2019, therefore it was not required to collect radionuclide data prior to this change in designation. The table and chart below shows the rolling annual average and the actual concentration of quarterly samples taken since the fourth quarter of 2019.

Table 1: Combined Radium-226 and Radium-228 Level at Stone Ridge Meadows

Quarters	Total Concentration of Sample (pCi/l)	Rolling Annual Average (pCi/l)
Q4 - 2019	4.4	-
Q1 - 2020	6.8	-
Q2 - 2020	7.7	-
Q3 - 2020	6.1	6.25
Q4 - 2020	2.8	5.85
Q1 - 2021	5.5	5.53
Q2 - 2021	5.4	4.95
Q3 - 2021	4.1	4.45
Q4 - 2021	4.2	4.80
Q1 - 2022	6.0	4.93
Q2 - 2022	1.5	3.95
Q3 - 2022	4.9	4.15

Figure 1: Combined Radium-226 and Radium-228 Samples at Stone Ridge Meadows



The AOC states that January 1, 2024 is the deadline to bring the Stone Ridge water system into compliance for the combined radium limit. This may be done by connecting to a nearby water system, pursuing the sale of the system to a utility company, or installing treatment at the well. Treatment of the radium can be very expensive and the current Home Owners Association (“HOA”) cannot afford this investment so it chose to sell the system to Confluence Rivers. The HOA contacted the City of St. Paul about a potential interconnection, but the proposal was denied by the City of St. Paul due to the high estimated cost of the project. The HOA then reached out to the City of O’Fallon about a potential interconnection. The City of O’Fallon is open to the potential interconnection and drafted an ordinance to present to the city council to allow Stone Ridge to connect. As discussed later in this memorandum, Confluence Rivers plans to interconnect with the City of O’Fallon and become a wholesale buyer of water from it. In addition to the need to meet the radium limits, the AOC mentions that the system needs to apply for a permit to dispense, which is required by 10 CSR 60-3.010(1)(D). Staff expects Confluence Rivers to apply for a permit to dispense, upon receiving ownership of the system.

DNR Inspection of Water System

DNR last inspected the water system on June 18, 2019 and found the system to be in compliance. This was before the elevated radium levels were discovered. The inspection resulted in an inspection report dated July 1, 2019. The report included the following recommendations:

1. As a new PWS, Stone Ridge Meadows must:
 - a. Apply and obtain a Permit to Dispense Water;
 - b. Retain documentation of certain reports and correspondences with DNR;
 - c. Create, and update as needed, an Emergency Operation Plan;
 - d. Pay the required laboratory and administration fees when notification is received; and
 - e. Pay the primacy fees when notification is received.
2. Clean the well head and casing and paint them with a rust preventing paint to prevent contamination entering the system.
3. Clean the joint connecting the storage tank to the well piping and paint with a rust preventing paint to prevent corrosion to the point of failure and cause unnecessary water outage.
4. Begin flushing the water system yearly and create a written procedure.
5. Regularly exercise valves in the distribution system to ensure they are maintained in good working order when needed.

Sewer System Background

The sewer system is a mechanical plant consisting of a flow equalization basin, bar screen, extended aeration treatment, clarifier, chlorination, dechlorination, and aerated sludge holding. The sludge is disposed of by a contract hauler multiple times per year. Per Confluence Rivers' response to Staff Data Request ("DR") No. 0006, sludge was last hauled away in August 2022, in the amount of approximately 2,000 gallons. The mechanical plant is housed inside a locked building, with appropriate signs, located at 118 Stone Ridge Meadows Drive in O'Fallon, Missouri.

The system operates under the DNR sewer permit MO0132349. Per the permit, the design flow is 10,000 gallons per day ("gpd") with an actual flow of 3,160 gpd. The subdivision is fully built out and, as a result, capacity is not a concern.

The sewer collection lines consist of 12-inch PVC gravity sewer pipes. There are no lift stations associated with this sewer plant, as it receives 100% of the effluent through a gravity collection system.

DNR Inspection of Sewer System

DNR last inspected this sewer system on July 30, 2020. The inspection resulted in an inspection report dated September 15, 2020 that includes the following three unsatisfactory findings:

1. Discharge Monitoring Reports for the monitoring period end date of August 31, 2015 to May 31, 2020, submitted by the system showed the sewer system violated permit effluent limits, which also resulted in violations to state regulations. These include exceedances of:
 - a. Biological Oxygen Demand (“BOD”): one exceedance for the monitoring period end date of May 31, 2020; the effluent limit is 30 milligrams per liter (mg/L) and the sample had 46 mg/L of BOD
 - b. Ammonia as Nitrogen: three exceedances for the monitoring period end dates of February 29, 2016 (sample contained 31.60 mg/L), February 28, 2018 (sample contained 4.90 mg/L), and February 29, 2020 (sample contained 3.0 mg/L); the effluent limit for each sample was 2.5 mg/L of Ammonia as Nitrogen
 - c. *E. Coli*: two exceedances for the monitoring period end dates of May 31, 2017 (3,080 pounds per 100 milliliter (#/100 mL)) and November 30, 2018 (3,080 #/100 mL); the daily maximum is 1030 #/100 mL.
2. During the DNR inspection, the facility failed to dechlorinate, which could lead to residual chlorine levels exceeding permit limits.
3. The outfall was not clearly marked in the field as required by state regulations and the DNR sewer permit.

The current owner of the sewer system took corrective actions to remedy the above mentioned unsatisfactory findings, and on June 2, 2021, the facility returned to compliance.

Staff’s Observations of Water and Sewer Systems

Staff inspected the water and sewer systems on October 20, 2022. Staff met with representatives from Confluence Rivers and toured the systems. Staff first inspected the hydropneumatic tank that is housed in a locked building. As noted by DNR, the joint connecting the storage tank to the well piping was severely rusted. This needs to be cleaned and re-painted to prevent corrosion to the point of failure and cause an unnecessary water outage. In addition, there is an area of green algae that may be evidence of, at least at one point in the past or currently, a leak under this joint. The algae trail travels along the bottom of the tank to a crack in the baseboard. Aside from the rust and possible leak, the tank itself was in good condition.

Next, Staff inspected the sewer system that is housed in a building right across from the water tank’s building. The building was locked and had the appropriate signs on the outside of the building. The system was in operation during Staff’s inspection. The sewer system was in good condition. Staff and representatives from Confluence Rivers looked for the outfall, but was unable to find it. Per DNR’s inspection report, the outfall should be located roughly 60 feet to the east of the building amongst overgrown vegetation. Upon ownership, Confluence Rivers should remedy this issue by cutting down the vegetation to ensure the outfall is easier to find and properly mark the outfall if needed. The outfall is the legal sampling point for determining compliance with effluent limits.

Lastly, Staff inspected the well head. It is located down the street from the water storage tank and sewer treatment facility on the side of a residential street in the subdivision. The well head was not locked nor protected against vandalism. Upon ownership, Confluence Rivers should put protective measures in place to prevent vandalism or harm to the well head.

Proposed Capital Investments

Staff asked Confluence Rivers about proposed capital investments in DR No. 0001. Below is a summary of Confluence Rivers' response.

Water System

- Connect to the City of O'Fallon's water supply and become a wholesale customer to significantly reduce the radionuclides in the water and install a master meter and pit; and
- Investigate the locations of water main and valves and replace valves, as necessary.

The proposed capital investments for the water system are estimated to be ** [REDACTED] **.

In addition to these capital improvements, Staff recommends the following:

- Apply for the permit to dispense;
- Repair the leak from the water tank;
- Clean and re-paint the joint connecting the storage tank to the well piping;
- General housekeeping of the tank building such as cleaning the floor and removing the algae trail;
- Secure wellhead to prevent vandalism or harm to it;
- Begin flushing the water system yearly and have a written procedure for flushing practices; and
- Regularly exercise valves in the distribution system to ensure they are maintained in good working order when needed.

Sewer System

- Install a flow meter and a remote monitoring system;
- Install a new electrical distribution panel and a manual transfer switch to allow for the use of a portable generator for use in emergency situations;
- Replace the airlifts in the equalization tank that feed the treatment plant with duplex grinder pump systems;
- Modify aeration process in the treatment system;
- Install new control panels with Variable Frequency Drive motors for blowers, allowing them to be throttled downwards or upwards as necessary to increase energy efficiency and reduce operational costs over time;
- The addition of new density current baffles in the clarifiers to inhibit the release of floating solids into the effluent;

- Develop system mapping of wastewater collection system to enhance the level of service and timing of responses to emergency and customer issues; and
- Install flow monitoring, perform smoke testing, perform video inspection at selected locations, evaluate systems and create location based maintenance priority list of wastewater collection system to help understand and reduce the effects of inflow and infiltration (commonly referred to as I&I) on the system.

The proposed capital investments for the sewer system are estimated to be ** [REDACTED] **.

In addition to these capital improvements, Staff recommends the following:

- Ensuring the outfall is located and clearly marked, and if needed, cut down any overgrown vegetation to ensure the outfall is easier to find; and
- Dechlorinate as instructed in the sewer permit.

Service Area

After reviewing the map of the proposed service area that was included in the Application, Staff worked with Confluence Rivers to secure a revised map that included the names of near-by highways and other streets. This allows for easier identification of the proposed service area within its general community. The revised map is included with this memorandum as Attachment A. The corresponding legal description is included with this memorandum as Attachment B.

Rate Base

The Auditing Department reviewed information provided by Confluence Rivers in response to Staff's Data Requests and the information in Confluence Rivers' Application, which included sale agreement documents and Confluence Rivers' workpapers. Typically, Staff recommends the value of plant investment, or "rate base," by studying documentation of the cost of constructing plant, along with annual depreciation expense, and whether or not plant facilities or money was contributed by customers or land developers.

However, due to the lack of original cost information for the plant, Staff calculated the net book value of the facilities as of November 16, 2022, using the information included in the Flinn engineering report provided in response to Staff DR No. 0027. Staff used the asset lists, estimated original costs, and installation dates to calculate the net book values for the water and sewer systems. The estimated net book values are \$46,997 for the water system and \$32,539 for the sewer system as shown below:

	Water	Sewer
Plant in Service	\$109,738	\$109,738
Accumulated Depreciation	\$62,741	\$77,199
CIAC	\$0	\$0
Net Plant minus CIAC	\$46,997	\$32,539
CIAC Amortization	\$0	\$0
Net Rate Base	\$46,997	\$32,539

Staff's calculation of rate base is above the amount of the proposed purchase price of
** [REDACTED] **

Depreciation

Staff's Engineering Analysis Department recommends the use of Confluence Rivers' current depreciation rates. These depreciation rates are included as Attachment C.

Customer Experience

Publicity and Customer Notice

According to information provided to Staff, Confluence Rivers stated that it is not aware of any notifications or meetings held to inform the residents of this proposed acquisition of Stone Ridge.

Customer Service and Billing

Stone Ridge customers will not have a local business office nearby; however, customers will be able to contact Confluence Rivers' customer service department by calling the toll-free phone number 866-946-3920, or by sending an email to customer service at support@confluenceriversuoc.com. There is also a toll-free phone number available for emergency calls. The emergency number, website and email are available 24/7. According to Confluence Rivers, this information will be provided on the customer brochure, the website, and in all written materials that will be sent to customers. The main office is open from 8:00 am to 5:00 pm M-F to respond to customer concerns forwarded by operations or customer service personnel. The main office is located at 1630 Des Peres Road, Suite 140, St. Louis, MO 63131. Additionally, main office customer service personnel are available to be contacted after hours for emergency calls.

Confluence Rivers will offer payment options including, check, money order, cashier's check, e-check, credit and debit cards. Other payment options include Apple pay, Google pay and PayPal Cash. The methods to pay are through the IVR ("interactive voice response"), pay online or mailing a check or money order to P.O. Box 676384, Dallas, TX 75267. Online payments can be made using check or credit/debit cards.

In order to incorporate Stone Ridge records into its billing and customer service systems, it will be necessary for Confluence Rivers to properly enter the appropriate customer information into its systems and apply the Commission-approved rates.

Rate and Tariff Matters

Currently, Stone Ridge customers are not charged for water or sewer service. Stone Ridge is located approximately 14 miles from the Glenmeadows Water and Sewer LLC (“Glenmeadows”) systems, and the Commission recently approved Confluence Rivers’ acquisition of the Glenmeadows water and sewer assets in Case No. WA-2023-0026. Confluence Rivers proposes to utilize the same rates for Stone Ridge that the Commission approved in the Glenmeadows case, which is a fixed monthly charge of \$27.50 for water service and a fixed monthly charge of \$27.50 for sewer service. While these rates are expected to be well below the cost of service, they are a step toward an appropriate rate and will help minimize rate shock. Additionally, Confluence Rivers proposes to utilize the rules governing the rendering of service currently found in Confluence Rivers’ existing P.S.C. MO No. 12 tariff for water service and its existing P.S.C. MO No. 13 tariff for sewer service, until the Commission orders new rates and rules.

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 each of Confluence River’s affiliates in previous CCN and transfer of assets cases before the Commission. Staff’s position on Confluence Rivers’ ability to meet TMF criteria remains positive regarding those affiliates, and it similarly takes the position that Confluence Rivers has adequate TMF capacity in this case. It is Staff’s position that Confluence Rivers has the ability to secure funding, to oversee construction of any necessary upgrades or repairs, and the ability to successfully manage operations of the Stone Ridge water and sewer utility systems.

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 Stone Ridge service area has both a desire and need for service. In addition, there is a need for the necessary steps to be taken to update the Stone Ridge water and sewer systems, and to ensure the provision of safe and adequate service. Further, Stone Ridge has made the decision to exit the water and sewer utility business, sell the systems to Confluence Rivers, and rely upon Confluence Rivers to properly operate and maintain the existing water and sewer systems in order that customers will continue to have safe and adequate service.

(2) Applicant's Qualifications

Confluence Rivers is qualified to own and operate the Stone Ridge systems. Confluence Rivers is an existing water and sewer corporation and public utility subject to the jurisdiction of the Commission. Confluence Rivers is currently providing water service to approximately 4,400 customers and sewer service to approximately 4,600 customers in several service areas throughout Missouri. Additionally, Confluence Rivers has affiliates that provide water and sewer service in several other states.

(3) Applicant's Financial Ability

Confluence Rivers anticipates no need for external financing to complete this acquisition, and has demonstrated over many years that it has adequate resources to operate utility systems it owns, to acquire new systems, to undertake construction of new systems and expansions of existing systems, to plan and undertake scheduled capital improvements, and timely respond and resolve emergency issues when such situations arise. From a Financial Analysis perspective, Confluence Rivers has the financial capacity to acquire this system without a negative impact on the purchaser's capital structure or financial ratios.

(4) Feasibility of the Proposal

Confluence Rivers' purchase of the systems, utilizing the proposed water and sewer rates noted above, is financially feasible. Confluence Rivers can draw upon the significant resources of its parent company, should any shortfall arise prior to the next rate case.

(5) Promotion of the Public Interest

Due to Stone Ridge's decision to sell its water and sewer utility systems and for the reasons outlined previously in this memorandum, Staff asserts that Confluence Rivers request for a CCN and related acquisition of the Stone Ridge water and sewer assets promotes the public interest. Customers will experience enhanced service with the improvements to the water and sewer systems. Confluence Rivers has demonstrated the ability to provide save and adequate service.

Other Issues

Stone Ridge, as an unregulated water and sewer nonprofit corporation, has no obligations due to the Commission, and has no pending actions before the Commission.

Confluence Rivers is a corporation that is in “good standing” with the Missouri Secretary of State.

Confluence Rivers is current with annual report filings with the Commission through calendar year 2021, as documented on the Commission’s Electronic Filing and Information System (“EFIS”).

Confluence Rivers is current on its annual assessment quarterly payments.

Confluence Rivers has other pending cases before the Commission, but none that would impact this decision.

Staff Recommendation

Based upon the above, Staff recommends that the Commission:

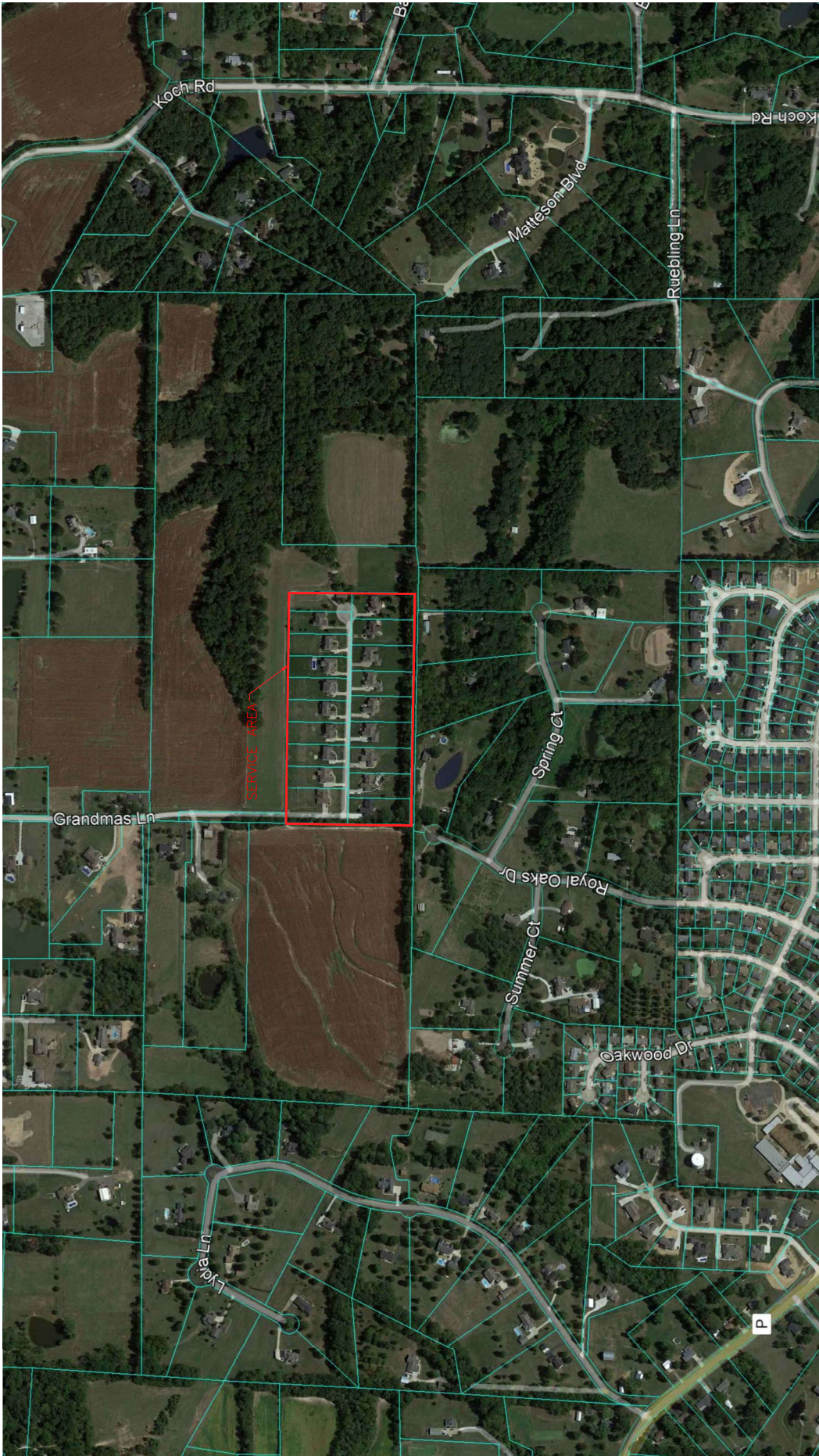
1. Grant Confluence Rivers a CCN to provide water service in the proposed Stone Ridge service area;
2. Approve Confluence Rivers’ proposed monthly charge of \$27.50 for water service, and the rules governing water service currently found in Confluence Rivers’ water tariff P.S.C. MO No. 12;
3. Approve Confluence Rivers’ proposed monthly charge of \$27.50 for sewer service, and the rules governing sewer service currently found in Confluence Rivers’ sewer tariff P.S.C. MO No. 13;
4. Require Confluence Rivers to submit tariff sheets, to become effective before closing on the assets, to include a revised service area map, service area written description, rates and charges;
5. Require Confluence Rivers to notify the Commission of closing on the assets within five (5) days after such closing;
6. If closing on the water system assets does not take place within thirty (30) days following the effective date of the Commission’s order approving such, require Confluence Rivers 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 Confluence Rivers determines that the transfer of the assets will not occur;
7. If Confluence Rivers determines that a transfer of the assets will not occur, require Confluence Rivers 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 Confluence Rivers to submit tariff sheets as appropriate that would cancel service area maps and descriptions applicable to the service area in its water and sewer tariffs, and rate and charges sheets applicable to customers in the service area in the water and sewer tariffs;

8. Require Confluence Rivers to keep its financial books and records for plant-in-service and operating expenses in accordance with the NARUC Uniform System of Accounts;
9. Require Confluence Rivers to adopt its current depreciation rates for the Stone Ridge systems and these rates are attached as Attachment C;
10. Require Confluence Rivers to provide training to its call center personnel regarding rates and rules applicable to the water customers in the acquired area;
11. Require Confluence Rivers to distribute to the customers in the acquired area an informational brochure detailing the rights and responsibilities of the utility and its customers consistent with the requirements of Commission Rule 20 CSR 4240-13, within thirty (30) days of closing on the assets;
12. Require Confluence Rivers to provide to the Customer Experience Department (“CXD”) Staff an example of its actual communication with the Stone Ridge customers regarding its acquisition and operations of the water, and how customers may reach Confluence Rivers, within ten (10) days after closing on the assets;
13. Require Confluence Rivers to provide to the CXD Staff a sample of five (5) billing statements from the first three month’s billing for the acquired Company within ten (10) days of the billings; and,
14. Require Confluence Rivers to file notice in this case outlining completion of the above-recommended training, customer communications, notifications and billing for each acquired company within ten (10) days after such communications and notifications.
15. Require Confluence Rivers to include the Stone Ridge water customers in its established monthly reporting to the CXD Staff on customer service and billing issues, on an ongoing basis, after closing on the assets; and,
16. Require Confluence Rivers to file notice in this case once Staff Recommendations Nos. 1-15 above have been completed.

Attachments:

- A. Service Area Map
- B. Service Area Description
- C. Depreciation Rates

**SERVICE AREA MAP
STONE RIDGE MEADOWS
(WATER & WASTEWATER)
ST. CHARLES COUNTY, MO**



DATE:	9/21/2023
PROJECT NO.:	
DRAWN BY:	KMK
SCALE:	
SHEET NAME:	
SERVICE AREA MAP	

Utility Note: Digdowner
 This service area map has been prepared based on a service area map provided by the system manager. 21 Design Group, Inc. performed no field verification of the layout and is unable to determine the exact location of this line. The location represents approximate location only and should not be used for construction purposes. This map is intended to assist the system manager in planning and preparing the scope for a license land surveyor. This sketch should not be used to interpret encroachment.



1234 Jefferson, Suite 500
 St. Charles, MO 63301
 (636) 261-1234

Stone Ridge Meadows Service Area Description:

The area served is part of the City of St. Paul, St. Charles County, Missouri and being more particularly described as follows:

Commencing from the southwest corner of the Northwest Quarter of the Southeast Quarter of Section 7, Township 47 North, Range 3 East; thence N1°23'11"E 20.00 feet to the point of beginning; thence N1°23'11"E 640.00 feet; thence S88°16'49"E 1191.00 feet; thence S1°23'11"W 640.00 feet; thence N88°16'49"W 1191.00 feet to the point of beginning, containing 17.50 acres more or less.

Confluence Rivers Utility Operating Company
SCHEDULE of DEPRECIATION RATES
WATER Class C & D
WR-2020-0053

Evergreen, Gladlo, Roy-L, Willows, Smithview, Majestic Lakes,
 Calvey Brook, Auburn Lakes and Eugene

NARUC USOA ACCOUNT NUMBER	ACCOUNT DESCRIPTION	DEPRECIATION RATE
SOURCE OF SUPPLY		
311	Structures & Improvements	2.5%*
314	Wells & Springs	2.0%*
PUMPING PLANT		
321	Structures & Improvements	2.5%*
325/325.1	Elec. Submersible Pumping Equipment	10.0%*
325.2	High Service or Booster Pumping Equip.	6.7%*
WATER TREATMENT EQUIPMENT		
331	Structures & Improvements	2.5%*
332	Water Treatment Equipment	2.9%*
TRANSMISSION & DISTRIBUTION MAINS		
341	Structures & Improvements	2.5%*
342	Distribution Reservoirs & Standpipes	2.5%*
343	Transmission & Distribution Mains	2.0%*
345	Customer Services	2.5%*
346	Customer Meters, Bronze (Calibrate)	3.3%*
346.1	Customer Meters, Plastic (Throw Aways)	10.0%*
347	Customer Meter Pits & Installation	2.5%*
348	Hydrants	2.0%*
GENERAL PLANT		
371	Structures & Improvements	2.5%*
372	Office Furniture & Equipment	5.0%*
372.1	Office Electronic & Computer Equip.	20.0%*
373	Transportation Equipment	13.0%*
379	Other General Equipment (tools, shop equip., backhoes, trenchers, etc.)	6.7%*

*Designates a rate proposed in this case, rather than a rate ordered by the Commission in a previous case.

Confluence Rivers Utility Operating Company

SCHEDULE OF DEPRECIATION RATES

SEWER Class B, C & D

WR-2020-0053

Villa Ridge, Mill Creek, Gladlo, Roy-L, Willows, Majestic Lakes,
Calvey Brook and Auburn Lakes

ACCOUNT NUMBER	ACCOUNT DESCRIPTION	DEPRECIATION RATES
COLLECTION PLANT		
311/351	Structures & Improvements	4.0%*
352.1	Collection Sewers (Force)	2.0%*
352.2	Collection Sewers (Gravity)	2.0%*
354	Services	2.0%*
355	Flow Measurement Devices	3.3%*
PUMPING PLANT		
361	Structures and Improvements	4.0%*
362	Receiving Wells	4.0%*
363	Electric Pumping Equipment	10.0%*
TREATMENT & DISPOSAL PLANT		
371	Structures and Improvements	4.0%*
372	Oxidation Lagoons	4.0%*
373	Treatment & Disposal Facilities	5.0%*
374	Plant Sewers	2.5%*
375	Outfall Sewer Lines	2.0%*
GENERAL PLANT		
390	Structures and Improvements	4.0%*
391	Office Furniture & Equipment	5.0%*
391.1	Office Electronic & Computer Equip.	14.3%*
392	Transportation Equipment	13.0%*
393	Other General Equipment/Stores Equipment	10.0%*
394	Tools/Shop/Garage Equip.	5.0%*
395	Lab Equipment	5.0%*
396	Power Operated Equipment	6.7%*
397	Communication Equipment	6.7%*

*Designates a rate proposed in this case, rather than a rate ordered by the Commission in a previous case.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., for Certificates of) Case No. WA-2023-0092
Convenience and Necessity to Provide)
Water and Sewer Service in an Area of)
St. Charles County, Missouri (Stone)
Ridge Meadows))

AFFIDAVIT OF AMANDA C. MCMELLEN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

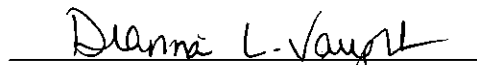
COMES NOW AMANDA C. MCMELLEN, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

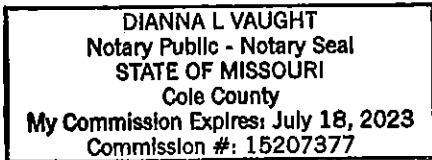
Further the Affiant sayeth not.


AMANDA C. MCMELLEN

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 20th day of December, 2022.


Notary Public



BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., for Certificates of) Case No. WA-2023-0092
Convenience and Necessity to Provide)
Water and Sewer Service in an Area of)
St. Charles County, Missouri (Stone)
Ridge Meadows))

AFFIDAVIT OF SARAH FONTAINE

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

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.

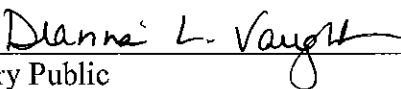
Further the Affiant sayeth not.


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 19th day of December, 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 Application of)	
Confluence Rivers Utility Operating)	
Company, Inc., for Certificates of)	Case No. WA-2023-0092
Convenience and Necessity to Provide)	
Water and Sewer Service in an Area of)	
St. Charles County, Missouri (Stone)	
Ridge Meadows))	

AFFIDAVIT OF AMANDA COFFER

STATE OF MISSOURI)	
)	ss.
COUNTY OF COLE)	

COMES NOW AMANDA COFFER, 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.

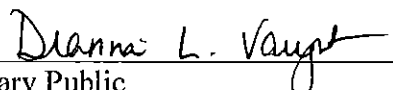
Further the Affiant sayeth not.



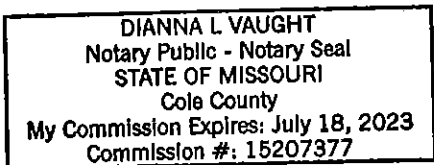
AMANDA COFFER

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 20th day of December, 2022.



 Notary Public



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., for Certificates of)
Convenience and Necessity to Provide)
Water and Sewer Service in an Area of)
St. Charles County, Missouri (Stone)
Ridge Meadows))

Case No. WA-2023-0092

AFFIDAVIT OF KERI ROTH

STATE OF MISSOURI)
)
COUNTY OF COLE)
) ss.

COMES NOW KERI ROTH, 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.

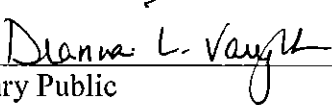


KERI ROTH

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 19th day of December, 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 Application of)
Confluence Rivers Utility Operating)
Company, Inc., for Certificates of) Case No. WA-2023-0092
Convenience and Necessity to Provide)
Water and Sewer Service in an Area of)
St. Charles County, Missouri (Stone)
Ridge Meadows))

AFFIDAVIT OF DARONN A. WILLIAMS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

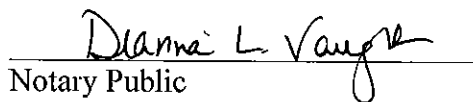
COMES NOW DARONN A. WILLIAMS, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


DARONN A. WILLIAMS

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 19th day of December, 2022.


Notary Public

