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

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In the Matter of the Application of Osage Utility Operating Company, Inc. to Acquire Certain Water and Sewer Assets and for a Certificate of Convenience and Necessity

File No. WA-2019-0185

## **RESPONSE TO STAFF RECOMMENDATION**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers"), the successor to Osage Utility Operating Company, Inc. ("Osage"), and, responds herein to the *Staff Recommendation* filed on May 13, 2022:

1. On May 4, 2022, Confluence Rivers moved to modify that part of the *Report and Order* in Case No. that requires Osage to file a rate case by May 2022.

2. The Staff of the Missouri Public Service Commission ("Staff") filed its *Staff Recommendation* concerning this motion on May 13, 2022. Therein, Staff stated that it does not object to Confluence River's request to modify the *Report and Order* to eliminate the requirement that Osage file a rate case by May 2022, so long as a condition is added requiring Confluence Rivers to file a rate case, which includes the Osage water and sewer systems, by May 2023.

3. Confluence Rivers does not object to the condition proposed in the *Staff Recommendation*.

**WHEREFORE**, Confluence Rivers requests the Commission issue an order modifying its *Report and Order* in WA-2019-0185 to remove ordered paragraph 18, the requirement for

Osage to file a rate case, subject to a requirement that Confluence Rivers file a rate case, which includes the Osage water and sewer systems, by May 2023.

Respectfully submitted,

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## ATTORNEYS FOR CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served electronically on all counsel of record herein on this 17<sup>th</sup> day of May, 2022.

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