

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

In the Matter of Lincoln County Sewer &)
Water, LLC for a Certificate of Convenience)
and Necessity Authorizing it to Own,) File No. WA-2012-0018
Operate, Maintain, Control and Manage)
Water Systems in Lincoln County,)
Missouri.)

**THE OFFICE OF THE PUBLIC COUNSEL’S RESPONSE
TO STAFF’S RECOMMENDATION**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response to Staff’s Recommendation states as follows:

1. On July 19, 2011, Lincoln County Sewer & Water (LCSW) filed applications with the Missouri Public Service Commission (Commission) seeking a certificates of convenience and necessity (CCN) to own, operate, maintain, control and manage water and sewer systems in Lincoln County, Missouri.
2. On February 10, 2012, the Staff of the Missouri Public Service Commission (Staff) filed its Recommendation to approve the applications in this case. Any response to Staff’s Recommendation was to be due on February 20, 2012, but the parties were granted additional time to March 22, 2012, to respond.
3. After a thorough review of Staff’s workpapers as well as discussion with several members of Staff, Public Counsel now states that it objects to Staff’s Recommendation and offers the attached Memorandum which includes a more detailed description of Public Counsel’s concerns.

WHEREFORE, Public Counsel respectfully submits its Response to Staff's Recommendation.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

Christina L. Baker (#58303)

Senior Public Counsel

P O Box 2230

Jefferson City, MO 65102

(573) 751-5565

(573) 751-5562 FAX

christina.baker@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 22nd day of March 2012:

General Counsel Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Rachel Lewis
General Counsel Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
rachel.lewis@psc.mo.gov

Dean Cooper
Brydon, Swearngen & England P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-3847 facsimile
dcooper@brydonlaw.com

/s/ Christina L. Baker
