

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

In the Matter of the Application of Seges)
Partners Mobile Home Park for a Certificate)
of Convenience and Necessity to Provide) Case No. WA-2008-0403 et al
Water Service.)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and for its Staff Recommendation states as follows to the Missouri Public Service Commission (Commission):

1. On June 19, 2008, Seges Partners Mobile Home Park, L.L.C. (Seges or Company) filed an *Application* to obtain from the Commission a certificate of convenience and necessity (CCN) to own, operate, maintain, control and manage a water system in Callaway County, Missouri, designated case no. WA-2008-0403.
2. On May 11, 2009, Seges filed an *Application* to obtain from the Commission a CCN to own, operate, maintain, control and manage a sewer system in Callaway County, Missouri, designated case no. SA-2009-0401.
3. On June 8, 2009, the Commission issued its *Order Granting Motion to Consolidate* which consolidated cases WA-2008-0403 and SA-2009-0401, and directed Staff to file its Recommendation or Status Report no later than July 25, 2009.
4. The Commission has authority to grant such CCN requests pursuant to Section 393.170 RSMo (2000). See also *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994), wherein the Commission set forth five (5) criteria that should be met before a certificate may be issued.

5. In the attached Memorandum, labeled Appendix A, Staff states its position that “the operation of the Company as outlined in its Application is both necessary and convenient for public service...” in that the operation of the system is currently relied upon by residential customers and that the Company has the necessary technical, managerial and financial capacities to own and operate the system.

6. Because Seges is currently relied upon by residential customers, pursuant to the Company’s current *Application*, Staff has engaged in an investigation to determine just and reasonable rates to be charged to its customers.

7. In the attached Memorandum, Staff recommends that the Commission issue an order which:

- 1) Approves a Certificate of Convenience and Necessity for Seges Partners Mobile Home Park, LLC for providing water and sewer service to the service area described in the *Application*;
- 2) Requires the Company to submit a complete tariff specifying a monthly Customer charge of \$12.49 plus \$2.37 for each 1,000 gallons of metered usage. The customers will not be billed for service until such time as the tariff is approved and made effective;
- 3). Requires the Company to submit a complete sewer tariff specifying a monthly Customer charge of \$19.45 plus \$2.73 for each 1,000 gallons of metered water usage. The customers will not be billed for service until such time as the tariff is approved and made effective;
- 4) Approves the schedules of depreciation rates attached to this Memorandum for use by the Company;

- 5) Recognizes that nothing in this Memorandum, or in any order issued by the Commission in this case, shall bind the Commission on any ratemaking issue in any future rate proceedings; and
- 6) Notes that the Company must abide by all Commission statutes, rules and decisions.

WHEREFORE, Staff submits its Recommendation for the Commission's consideration.

Respectfully submitted,

/s/ Shelley Syler Brueggemann

Shelley Syler Brueggemann
Missouri Bar No. 52173

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 24th day of July 2009.

/s/ Shelley Syler Brueggemann

STAFF'S INVESTIGATION

Seges owns the area to be served, which is a twenty-five acre property divided into 114 lots, and which was originally developed in the 1970's. Each lot is outfitted with a concrete slab for placement of a single-family residential manufactured home. There are currently sixty-one residential customers receiving both water and sewer service in the development. This level of customers has remained relatively consistent over the past 3 years. Therefore, Staff has assumed this customer level for ratemaking purposes.

The property receives wholesale water service from Callaway County Public Water Supply District No. 1 (PWSD1) and wholesale sewer service from the City of Holts Summit (City). Seges does not own or maintain either a water supply or a wastewater treatment facility; only the water distribution and wastewater collection pipelines. A master meter is in place where the PSWD1 water main enters the serviced area, and Seges is billed for water and sewer service once per month based upon usage as recorded by that meter. PWSD1 charges Seges \$0.25/100 gallons for water and the City charges Seges a monthly customer charge of \$14.13/pad in the park plus \$0.27/100 of water usage. The City and PWSD1 have each declined to serve the residents of the mobile home park as individual customers.

Seges installed water meters at each residence in 2007 and began billing the residents of the park for both water and sewer, based upon actual usage, at that point. Seges has been billing the customers at a rate of \$0.34/100 gallons for water and \$1.16/100 gallons for sewer; both based upon metered water usage. The Company's intent was to recoup at least some of the cost of water and sewer service Seges has been paying to the PWSD1 and the City, as well as promote conservation of water in the park as there were occurrences of misuse and waste by some of the residents.

Seges was not aware that a water or sewer CCN was required, and therefore did not submit any application for such. Commission Staff and Seges have been working toward resolution of the situation since Staff was made aware of it. Ultimately, the Company submitted applications for CCNs for both water and sewer. Seges is a corporation in good standing with the Missouri Secretary of State.

There are no known Missouri Department of Natural Resources (MDNR) compliance issues for the subject water or sewer systems. The water facility operates under MDNR Permit Number MO-2041558. Regular sampling of the water from points throughout the distribution system is required by the permit. MDNR does not require a permit for the sewer collection system.

Items reviewed during Staff's investigation of the subject *Application* included the Company's overall plan for providing the proposed services in the requested service area. Additionally, Staff analyzed the Company's ability to meet the "Tartan Energy Criteria", which are the criteria historically used by the Commission in evaluating CCN applications. The Tartan Energy Criteria, with criterion (1) slightly modified by Staff, are set out later in this Recommendation.

In addition to the above-referenced reviews and analysis, Staff also performed its own cost-of-service analysis and rate calculations for the systems, which will be discussed in more detail later in this Recommendation.

THE APPLICATION AND STAFF'S REVIEWS

WATER SERVICE:

The area is served by a PVC pipe distribution system with wholesale drinking water provided by PWS1. The distribution lines were contributed by the Company. The individual water meters installed in 2007 are considered Rate Base. Depreciation of the meters since they were put in use has been accounted for by Staff, leaving \$4,068 as the current Rate Base for the Company. Rate Base plus revenue requirement was used by Staff to determine the following proposed rate:

Monthly Customer Charge:	\$12.49
Commodity charge, per 1,000 gallons:	\$2.37
Monthly Customer Bill for Average Use of 4,000 gallons/month:	\$21.97

The *Rate Base, Expenses and Rate Calculation Worksheet—Water* can be found as "Attachment 1" and the depreciation rates used in determining rates are included in "Attachment 3" of this Memorandum.

SEWER SERVICE:

The area is served by a gravity-flow collection system with wholesale sewer service provided by the City. The collection lines were contributed by the company, and no other facilities are owned or maintained by the Company. Therefore, rates have been calculated based upon revenue requirement, as follows:

Monthly Customer Charge:	\$19.45
Commodity charge, per 1,000 gallons:	\$2.73
Monthly Customer Bill for Average Use of 4,000 gallons/month:	\$30.36

The *Rate Base, Expenses and Rate Calculation Worksheet—Sewer* can be found as “Attachment 2” and the depreciation rates used in determining rates are included in “Attachment 3” of this Memorandum.

The Company will need to file a complete water tariff and a complete sewer tariff after the Commission grants the respective CCN for each service. Staff will assist the Company with this task, and anticipates the tariffs will be similar to the Water & Sewer Department’s example tariffs for water and sewer utilities.

TARTAN ENERGY CRITERIA EVALUATION

As noted previously, Staff analyzed the Company's ability to meet the Tartan Energy Criteria, as has historically been done in evaluating certificate applications. Staff's conclusions regarding this matter are set out as follows:

Q. Is there a need for the proposed services, and is there a need for this Company to provide the proposed services?

A. The water and sewer systems are in place and serving the customers in the proposed service area. The City and public water district have declined to take the customers on individually. The Company wishes to justly pass on the cost of providing the services to the customers based upon metered usage, rather than charge them all a flat rate regardless of actual usage. As a result, Staff believes there is a need for the Company to be the entity providing the services to the area.

Q. Is the Company qualified to provide the proposed services?

A. Staff believes that the Company has demonstrated the technical and managerial ability to operate the systems, in that they have been doing so effectively for two years. The Company also has business experience in managing the mobile home park; renting and leasing mobile homes and pads. Additionally, the Company has contracted with an established MDNR certified operator to run the systems.

Q. Does the Company have the financial ability to provide the proposed services?

A. The initial investment in the water distribution and sewer collection facilities is being recouped in the pad rental and therefore does not represent a debt that remains to be paid. Staff believes that the Company has the financial capability through bank financing and owner funding to support the already existing utilities,

and will be able to generate sufficient cash flow to remain viable, given the proposed rates.

Q. Is the Company's proposal economically feasible?

A. Staff, having conducted an audit of investment and expenses, believes the proposal for the water and sewer systems is economically feasible, conditioned upon adoption of Staff's proposed rates. The majority of all potential customers are in place and have been billed for the services in the past, thus it should not be a "new" economic burden on the customers.

Q. Does the Company's proposal promote the public interest?

A. Staff believes the Company's proposal promotes the public interest because the existing central systems are desirable for a good living environment for the involved customers. Further, since the City and PWSD1 are not willing to accept the park residents as individual customers, certificating the Company to charge the customers based on metered usage will distribute the cost of the services more justly than a flat rate to each customer and promote the conservation of resources through accountability.

STAFF'S CONCLUSIONS

Staff is of the opinion that the operation of the Company as outlined in its Application is both necessary and convenient for public service, and that the proposed rates to be contained in the Company's tariffs are just and reasonable. There is a need for the services, in that they are currently in operation, and therefore relied upon, for the area. Staff believes the Company has the necessary technical, managerial and financial capacities, in part because a licensed water and wastewater operator has been contracted to operate the systems. Additionally, the owner of the Company is an established business owner in the vicinity and has been managing the operation of the systems for several years.

STAFF'S RECOMMENDATIONS

Based upon the above, Staff recommends that the Commission issue an order that:

- 1) Approves the Certificates of Convenience and Necessity for Seges Partners Mobile Home Park, LLC for providing water and sewer service to the service area described in the *Application*;

- 2) Requires the Company to submit a complete water tariff specifying a monthly Customer charge of \$12.49 plus \$2.37 for each 1,000 gallons of metered usage. The customers will not be billed for service until such time as the tariff is approved and made effective;
- 3) Requires the Company to submit a complete sewer tariff specifying a monthly Customer charge of \$19.45 plus \$2.73 for each 1,000 gallons of metered water usage. The customers will not be billed for service until such time as the tariff is approved and made effective;
- 4) Approves the schedules of depreciation rates attached to this Memorandum for use by the Company.
- 5) Recognizes that nothing in this Memorandum, or in any order issued by the Commission in this case, shall bind the Commission on any ratemaking issue in any future rate proceedings.
- 6) Notes that the Company must abide by all Commission statutes, rules and decisions.

After the Company submits the complete tariffs, Staff will submit an additional recommendation regarding approval of the tariffs.

List of Attachments

- Attachment 1: *Rate Base, Expenses and Rate Calculation Worksheet- Water*
Attachment 2: *Rate Base, Expenses and Rate Calculation Worksheet- Sewer*
Attachment 3: *Staff Work Papers; Comments and Recommendations – Arthur Rice*

**SEGES PARTNERS MOBILE HOME PARK - MO PSC CASE NO. WA-2008-0403 et al
RATE BASE, EXPENSES AND RATE CALCULATION WORKSHEET**

WATER

Ultimate Project Design

61 Single family homes over 3 years	3,863 gallons per customer per month
	2,827,716 gallons total annual water use
	7,747 gallons average daily use
61 customers at year two level	
2,827,716 gallons annual water use for 61 customers	
7,747 gallons average daily use	

Requested Rates - Annual Revenues(at year two customers) - Customer Bill

\$0.00 Monthly Minimum	Annual Revenue	\$	9,955
\$3.40 Commodity per 1,000 gal.	Bill for 4,000 gallons	\$	13.60

Plant In Service, Rate Base and Depreciation Expense

Description of Plant Item	Original Plant Costs	Net Plant at 3/31/09	Rate Base at 3/31/09	CIAC at 3/31/09	Depreciation/Amortization	
					Rate	Expense
1 Pipelines - distribution *	\$ 5,250	\$ -	\$ -	\$ 5,250	2.00%	N/A
2 Water Meters **	\$ 4,882	\$ 4,068	\$ 4,068	\$ -	10.00%	\$ 488
3 Office Furn/Equip	\$ -	\$ -	\$ -	\$ -	5.00%	\$ -
4 Organization ***	\$ 2,500	\$ -	\$ -	\$ -	20.0%	\$ 500
TOTALS	\$ 12,632	\$ 4,068	\$ 4,068	\$ 5,250		\$ 988

* Pipeline is contributed property

** Net Plant calculation based on assumed in-service date of 07/31/2007.

*** To be amortized over 5 years beginning with issuance of certificate, with rate base treatment for unamortized balance.

Ratemaking Income Statement and Rate Design Allocations

Expenses - Descriptor (most from Company's year two level)	Total	Customer	Commodity
1 Salaries (operations)	\$ 5,400	\$ 5,400	\$ -
2 Salaries (management)	\$ 900	\$ 900	\$ -
3 Billing and Collection	\$ 300	\$ 300	\$ -
4 Meter Reading	\$ 240	\$ 240	\$ -
5 Electric and Phone	\$ -	\$ -	\$ -
6 Purchased Water	\$ 6,699	\$ -	\$ 6,699
7 Monitoring and Sampling (mileage to well 6 days/week)	\$ -	\$ -	\$ -
8 Materials and Supplies	\$ -	\$ -	\$ -
9 Maintenance	\$ 520	\$ 520	\$ -
10 Office Supplies	\$ -	\$ -	\$ -
11 Postage	\$ -	\$ -	\$ -
12 Office Rent	\$ -	\$ -	\$ -
13 Legal and Accounting	\$ -	\$ -	\$ -
14 Fees - Lab	\$ -	\$ -	\$ -
15 Fees - MDNR	\$ 200	\$ 200	\$ -
16 Operator Certification	\$ -	\$ -	\$ -
17 Property Taxes	\$ -	\$ -	\$ -
18 Insurance	\$ -	\$ -	\$ -
19 Contingencies/Miscellaneous	\$ -	\$ -	\$ -
20 Interest 0%	\$ -	\$ -	\$ -
21 Return 9.5%	\$ -	\$ -	\$ -
22 Depreciation/Amortization (amortization of cost of certificate case)	\$ 386	\$ 386	\$ -
23 Income Tax	\$ 96	\$ 96	\$ -
24 PSC Assessment 0.745650% of revenue	\$ 114	\$ 114	\$ -
25 Total Cost of Service	\$ 15,843	\$ 9,144	\$ 6,699

Proposed Monthly Rates - Customer Bill

Customer Charge	Commodity Rate/1,000 gal	Customer Bill for 4,000 gal.
\$12.49	\$2.37	\$21.97

Attachment 1

**SEGES PARTNERS MOBILE HOME PARK - MO PSC CASE NO. WA-2008-0403 et al
RATE BASE, EXPENSES AND RATE CALCULATION WORKSHEET**

SEWER

Ultimate Project Design

61 Single family homes over 3 years	3,863 gallons per customer per month
	2,827,716 gallons total annual water use
	7,747 gallons average daily use
61 customers at year two level	
2,827,716 gallons annual water use for 61 customers	
7,747 gallons average daily use	

Requested Rates - Annual Revenues- Customer Bill

\$0.00 Monthly Minimum	Annual Revenue	\$ 33,965
\$11.60 Commodity per 1,000 gal.	Bill for 4,000 gallons	\$ 46.40

Plant In Service, Rate Base and Depreciation Expense

Description of Plant Item	Original Plant Costs	Net Plant at 3/31/09	Rate Base at 3/31/09	CIAC at 3/31/09	Depreciation/Amortization	
					Rate	Expense
1 Pipelines - collection *	\$ 31,725	\$ -	\$ -	\$ 31,725	2.00%	N/A
2 Sewer Treatment facility	\$ -	\$ -	\$ -	\$ -		
3 Office Furn/Equip	\$ -	\$ -	\$ -	\$ -	5.00%	\$ -
4 Organization ***	\$ 2,500	\$ -	\$ -	\$ -	20.0%	\$ 500
TOTALS	\$ 34,225	\$ -	\$ -	\$ 31,725		\$ 500

* Pipeline is contributed property

** Net Plant calculation based on assumed in-service date of 07/31/2007.

*** To be amortized over 5 years beginning with issuance of certificate, with rate base treatment for unamortized balance.

Ratemaking Income Statement and Rate Design Allocations

Expenses - Descriptor (most from Company's year two level)	Total	Customer	Commodity
1 Salaries (operations)	\$ -	\$ -	\$ -
2 Salaries (management)	\$ 900	\$ 900	\$ -
3 Billing and Collection	\$ 300	\$ 300	\$ -
4 Meter Reading	\$ -	\$ -	\$ -
5 Electric and Phone	\$ -	\$ -	\$ -
6 Purchased Sewer Treatment	\$ 18,055	\$ 10,343	\$ 7,712
7 Materials and Supplies	\$ -	\$ -	\$ -
8 Maintenance	\$ 520	\$ 520	\$ -
9 Office Supplies	\$ -	\$ -	\$ -
10 Postage	\$ -	\$ -	\$ -
11 Office Rent	\$ -	\$ -	\$ -
12 Legal and Accounting	\$ -	\$ -	\$ -
13 Fees - Lab	\$ -	\$ -	\$ -
14 Fees - MDNR	\$ -	\$ -	\$ -
15 Operator Certification	\$ -	\$ -	\$ -
16 Property Taxes	\$ -	\$ -	\$ -
17 Insurance	\$ -	\$ -	\$ -
18 Contingencies/Miscellaneous	\$ -	\$ -	\$ -
19 Interest 0% 0% debt	\$ -	\$ -	\$ -
20 Return 9.5% 100% equity	\$ -	\$ -	\$ -
21 Depreciation/Amortization (amortization of cost of certificate case)	\$ 500	\$ 500	\$ -
22 Income Tax	\$ -	\$ -	\$ -
23 PSC Assessment 8.47% of revenue	\$ 1,675	\$ 1,675	\$ -
24 Total Cost of Service	\$ 21,950	\$ 14,238	\$ 7,712

Proposed Monthly Rates - Customer Bill

Customer Charge	Commodity Rate/1,000 gal	Customer Bill for 4,000 gal.
\$19.45	\$2.73	\$30.36

Attachment 2

Application of Seges Partners Mobile Home Park, L.L.C.
For a Certificate of Convenience and Necessity

Case No. WA-2008-0403 and SA-2009-0401

STAFF WORK PAPERS for Arthur Rice

COMMENTS AND RECOMMENDATIONS - Arthur Rice

List of Attachments

Excel File - Seges WA-2008-0403 Depreciation Rates.xls - Recommended Depreciation Rates

Excel File - Seges SA-2009-0401 Depreciation Rates.xls - Recommended Depreciation Rates

PRIOR RATE CASE SPECIAL ISSUES

Prior Case Numbers: NONE

Case Major Issues: Seges Partners Mobile Home Park, L.L.C (Seges) is currently receiving water from Callaway County Public Water Supply District No. 1 (PWSD1), and sewer service from the City of Holts Summit. Seges meters the water to each residence, and then invoices the mobile home park residents for water and sewer service separate from the mobile home pad rent. Seges has applied for a Certificate of Convenience and Necessity (CCN) for the water service, and sewer service.

FACILITY TOUR

Staff, (Arthur Rice, Kim Bolin and Martin Hummel) visited Seges on March 12, 2009. Seges staff attending the meeting included Mike Otten and Allison Schowengerdt. Seges was given copies of the following:

Attachment 3

- a) NARUC Universal System of Accounts (USOA), 1973 Class D for small water companies.
- b) the 2008 small water and sewer annual report form required by the Public Service Commission (PSC).
- c) references to Missouri Code of State Regulations; 4-CSR 240 Chapters 3, 10 and 50.

On this same day, March 12, 2009, the local PWSD1 was installing new fire hydrants in the water main adjacent to the trailer park. The water district field manager was present and confirmed the location of the one main water meter furnished by PWSD1, and that the responsibility of the PWSD1 stopped at that meter.

During a meeting at the PSC offices on March 18, 2009, Seges provided a copy of a survey of the trailer park which references sewer manholes and the PWSD1 meter.

On May 19, 2009, Art Rice met with Keith Edwards, Sewer Superintendent, for the City of Holts Summit (City). Mr. Edwards said that all of the gravity sewer system within the trailer park is owned and operated by the trailer park. There is a sewer lift station on the north side of the trailer park that collects from some of the north east lots. It is simply to lift those lots and dump it into the gravity main 300 feet away inside the park. The City owns and maintains the lift station and the associated 300 feet of force main. Mr. Edwards also said that there is a project to eliminate this lift station and make it into a gravity line flowing to the lift station at J&L trailer park to the north. When that occurs, the force main and lift station will be abandoned and all of the remaining collection facilities within the park property will belong to the trailer park.

The force main shown on the survey coming from J&L Trailer Park has been re- routed such that it no longer enters Seges system, or the trailer park property.

Currently, the entire sewer from the trailer park flows into the city main at manhole located on the park property line, (southern most manhole near the back of the park). When the lift station is abandoned by the City a second exit will be created from the park leading to the City system.

ACCOUNT REVIEWS

LEDGERS OF UTILITY PLANT ACCOUNTS, WORK ORDERS, RETIREMENTS, COST OF REMOVAL and SALVAGE

Approximately 30 minutes was spent with Allison Schowengerdt discussing the treatment of plant assets with respect to regulatory accounting, depreciation, USOA account numbers, work orders and the flow of this information into the annual report forms.

CCN PROJECT COST ESTIMATE REVIEW

At this time Seges has not provided historical cost or cost estimates related to plant assets. From the survey drawing, an estimate of installed plant is as follows.

An estimate of the water system's plant is that it consists of approximately 3000 feet of distribution main, with taps for about 110 trailer pads. Seges provides water meters which are installed above ground under the trailer. The meters have a remote read out which is attached to the skirt of the trailer. It is the trailer owners responsibility to heat trace the meter and associated piping for freeze protection. The initial installation was in the mid 1970's, which puts it at about 35 years old. An estimate of installed cost for the distribution system is \$1.75 per foot of piping, or approximately \$5,250.00. If another \$750.00 for the PWSD1 connection fee is added, then this gives an estimate of \$6000.00 for the distribution system.

An estimate of the initial installed cost of the sewer collection system which is currently in service is as follows. From the survey drawing there is approximately 3900 feet of collection piping, mostly 10" PVC, and 15 manholes. Estimated installed cost in mid 1970's is \$6.50 per foot of pipe and \$425.00 per manhole. Total installed cost estimate of installed and in use sewer collection system is \$31,725.00.

RECOMMENDATIONS:

The attached excel file "Seges WA-2008-0403 Depreciation Rates.xls" is the recommended USOA plant accounts numbers and depreciation rates for Seges Partners Mobile Home Park L.L.C. water company operations.

The attached excel file "Seges SA-2009-0401 Depreciation Rates.xls" is the recommended USOA plant accounts numbers and depreciation rates for Seges Partners Mobile Home Park L.L.C sewer company operations.

Arthur Rice, PE

Seges Partners Mobile Home Park, L.L.C.

DEPRECIATION RATES (WATER)

WA-2008-0403

<u>ACCOUNT NUMBER</u>	<u>ACCOUNT DESCRIPTION</u>	<u>DEPRECIATION RATE</u>	<u>AVERAGE SERVICE LIFE (YEARS)</u>	<u>NET SALVAGE</u>
343	Transmission & Distribution Mains	2.0%	50	
345	Services	2.5%	40	
346	Meters	10.0%	10	

Seges Partners Mobile Home Park L.L.C.

DEPRECIATION RATES (SEWER)

SA-2009-0401

<u>ACCOUNT NUMBER</u>	<u>ACCOUNT DESCRIPTION</u>	<u>DEPRECIATION RATE</u>	<u>AVERAGE SERVICE LIFE (YEARS)</u>	<u>NET SALVAGE</u>
352.2	Collection Sewers (Gravity)	2.0%	50	0%
354	Services	2.0%	50	0%

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

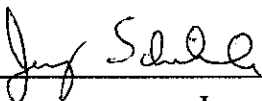
In the Matter of the Application of Seges)
Partners Mobile Home Park, L.L.C., for a) Case No. WA-2008-0403 et al
Certificate of Convenience and Necessity to) (consolidated with SA-2009-0401)
Provide Water Service.)

AFFIDAVIT OF JERRY SCHEIBLE, P.E.

STATE OF MISSOURI)
) SS
COUNTY OF COLE)

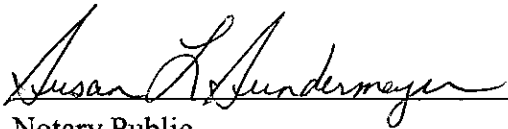
COMES NOW Jerry Scheible, being of lawful age, and on his oath states the following:

(1) that he is a Utility Regulatory Engineer in the Missouri Public Service Commission's Water & Sewer Department; (2) that he participated in the preparation of the foregoing Staff Recommendation Memorandum; (3) that he has knowledge of the information presented in the foregoing Staff Recommendation Memorandum; and (4) that the information presented in the foregoing Staff Recommendation Memorandum is true and correct to the best of his knowledge, information and belief.



Jerry Scheible

Subscribed and sworn to before me this 23rd day of July 2009.



Notary Public



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086

My Commission Expires: 9-21-10

BEFORE THE PUBLIC SERVICE COMMISSION

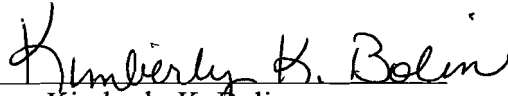
OF THE STATE OF MISSOURI

In the Matter of the Application of Seges)
Partners Mobile Home Park for a Certificate) Case No. WA-2008-0403
of Convenience and Necessity to Provide)
Water Service) and
)
) Case No. SA-2009-0401

AFFIDAVIT OF KIMBERLY K. BOLIN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

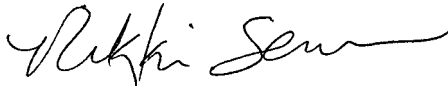
Kimberly K. Bolin, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Staff Memorandum/Recommendation in memorandum form, to be presented in the above case; that some of the information in the Staff Memorandum/Recommendation was developed by her; that she has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true and correct to the best of her knowledge and belief.



Kimberly K. Bolin

Subscribed and sworn to before me this 17th day of July, 2009.

NIKKI SENN
Notary Public - Notary Seal
State of Missouri
Commissioned for Osage County
My Commission Expires: October 01, 2011
Commission Number: 07287016



Notary Public