

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

In the Matter of Elm Hills Utility) Operating Company, Inc.'s Request for) a Water and Sewer Rate Increase)	Case No. WR-2020-0275
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RESPONSE TO ORDER DIRECTING EXPEDITED RESPONSES

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Response to Order Directing Expedited Responses*, states as follows:

1. The Commission’s *Order Directing Expedited Responses* ordered “[p]arties interested in responding to Elm Hills’ response regarding a due date of June 15, 2020 and a page limitation shall file such response no later than 2:00 p.m. on June 12, 2020 (today).”

2. In response the OPC states as follows: first, in regard to the June 15th deadline, this is insufficient time; second, in regards to the page limitation, the OPC suggests setting a one page (front and back) page limit for all parties to the case.

3. To expand on the June 15th deadline being insufficient, the OPC notes that the parties just exchanged their initial audits in this case on Thursday the eleventh of June. The OPC is still evaluating the information supplied and requires more time to fully develop an assessment of where the case currently stands before explaining its position to customers.

4. The OPC therefore respectfully recommends that, instead of June 15th, the Commission order all the parties to provide their position hand-outs to the

Company by close of business on Tuesday June 16th. The OPC re-iterates that it is fine with setting a page limitation and again recommends a one page (front and back) limit.

5. The OPC has reached out to Elm Hills regarding moving the due date for handouts to Tuesday June 16th, and Elm Hills has indicated that this is acceptable.

6. In addition, the Commission's *Order Directing Expedited Responses* also ordered that "[p]arties interested in responding to Elm Hills response regarding the suggested process to allow customers the option of receiving a packet of information, shall file such response no later than 10:00 a.m. on June 15, 2020." The OPC will provide its response now.

7. The clear communication of information to the customers served by the utilities that the Commission oversees should be of vital importance to the Commission. The Commission should therefore seek to achieve the highest degree of clear and full communication as is possible.

8. Elm Hill's suggestion, which places the burden on ratepayers to seek out additional information, is unnecessary and is more likely to lead to community members feeling like there has not been sufficient communication than anything else.

9. Further, Elm Hill's apparent concern that customers may not want to receive the information is irrelevant. If the Customers don't want to stay informed, then they will simply not read the handouts.

10. Given the novelty of this proposed proceeding, the difficulties surrounding the current conduction of business, and the vital importance communication plays within the role of the Public Service Commission at large and the concept of local public hearings in general, the Commission should seek to make the collection of information by customers as easy as possible. Doing that would entail adopting the proposed “hand out” stratagem set forth in the *Joint Filing*.

11. Finally, the OPC would note that this same concept was already proposed and agreed upon by all the parties in another small water rate case. See *Joint Proposal for Virtual Hearing and Public Comment*, WR-2020-0264.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission order all parties to the case who are interested in providing a hand-out to customers prior to the proposed virtual local public hearing to provide their position hand-outs to Elm Hills on Tuesday June 16th and further order that such hand-outs be limited to one page (front and back).

Respectfully submitted,

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