

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

In the Matter of Suburban Water and Sewer            )  
Company's Water Utility Rate Increase            )    **Case No. WR-2005-0455**  
Request.    )

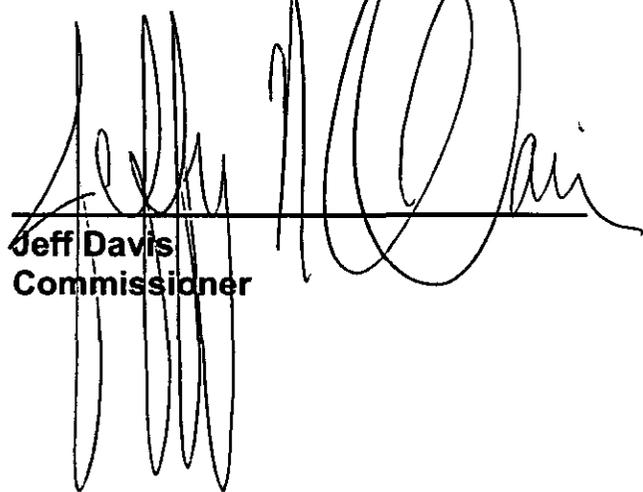
**Concurring Opinion of Commissioner Jeff Davis**

I concur with the Commission's Order Approving Small Company Rate Increase and Approving Tariff. However, I would like to address the issue of small, investor-owned water and sewer company management.

This case illustrates the problems that can arise when a small, investor-owned water or sewer company needs to raise its rates to maintain its facilities. Here, the owner-operator appears to have had limited knowledge on the procedures to effectuate a rate increase. In particular, they failed to make any filing with the Commission. Once notified of their error, the company immediately followed the proper procedures and this matter was resolved; however, it causes this Commissioner great concern that this small investor-owned utility, as well as other investor-owned utilities, might not be aware that they have filing requirements with this Commission. Furthermore, the thought that investor-owned utilities like Suburban Water & Sewer Company may not know the proper process for a rate increase should be cause for great concern in that they may not know about new environmental regulations that could have a much greater impact on the utility and its customers.

In conclusion, owning a small utility can be very challenging in an environment of government regulation. Owning a utility is replete with responsibilities to the rate payers, state authorities, and federal authorities; the duty to stay abreast of current law is the responsibility of the owners and operators of such utilities.

**Respectfully submitted,**



A handwritten signature in black ink, appearing to read 'Jeff Davis', is written over a horizontal line. The signature is stylized and cursive.

**Jeff Davis  
Commissioner**

Dated at Jefferson City, Missouri,  
on this 14<sup>th</sup> day of July, 2005.