

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

In the Matter of the Application of Rate)	
Increase Request for Liberty Utilities)	File No. WR-2018-0170
(Missouri Water), LLC d/b/a Liberty)	(consolidated with) SR-2018-0171
Utilities)	

**MOTION FOR ORDER DIRECTING LOCAL PUBLIC HEARINGS
AND SUGGESTIONS IN SUPPORT**

COMES NOW the Office of Public Counsel (“OPC”), and files this Motion for Local Public Hearings. OPC requests the local public hearings to be scheduled in June, at least one in or near Branson and one in Jefferson County. In support of its Motion, OPC respectfully states:

1. On December 15, 2017, Liberty Utilities (Missouri Water) (“Liberty Water” or “Company”) filed an Application Letter under the Commission’s Small Company Rate Increase Request, pursuant to 4 CSR 240-3.050.

2. In its Application, the Company asked for an increase of \$995,844 in its annual water system operating revenues and an increase of \$196, 617 in its annual sewer system operating revenues. (App. Letter, Dec. 15, 2017)

3. On January 3, 2018, the Company filed a Motion to Consolidate, based on the fact that the “water and sewer operations are owned and operated by the same entity (Liberty Utilities) and have common offices, personnel and overheads,” claiming it would be “administratively expedient” to consolidate.

4. The Commission agreed and issued its *Order Consolidating Cases* on January 26.

5. On February 8, 2018 Orange Lake Country Club, Inc. and Silverleaf Resorts Inc. (“Movants”) Motion to Dismiss, or in the Alternative, to Order Liberty Utilities (Missouri

Water), LLC to File a Tariff Pursuant to Section 393.140(11), in response to which the Commission issued its *Order Directing Responses to Motion to Dismiss*, to which both Commission Staff (“Staff”) and the Company responded. The Commission has not ruled on Movant’s requests.

6. In addition, on April 3, Movants requested an Evidentiary Hearing, to which the Company replied in Opposition. This matter also remains pending.

7. On April 11, the Commission has ordered a Procedural Conference be held on April 20.

8. OPC is requesting at least two local public hearings because of the geographic disparity between the systems.

9. As shown by Movant’s counsel’s filings in this case customers have an interest in being heard, and should be given the opportunity to testify about their concerns.

WHEREFORE, OPC requests the Commission schedule at least two local public hearings.

Respectfully submitted,

OFFICE OF PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

On this 20th day of April, 2018, I hereby certify that a true and correct copy of the foregoing motion was submitted to all relevant parties by depositing this motion into the Commission's Electronic Filing Information System ("EFIS").

/s/ Lera Shemwell