

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

In the Matter of Missouri-American Water)
Company for a Certificate of Convenience)
and Necessity Authorizing it to Install,) File No. WA-2015-0019
Own, Acquire, Construct, Operate, Control,)
Manage and Maintain Water and Sewer)
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 21, 2014, Missouri-American Water Company (MAWC) filed an Application with the Missouri Public Service Commission (Commission) requesting that the Commission grant it Certificates of Convenience and Necessity to install, own, acquire, construct, operate, control, manage and maintain a water and sewer system for the area known as Anna Meadows subdivision in Lincoln County, Missouri. MAWC stated that it intends to provide service in the area by acquiring the existing water and sewer systems serving the Anna Meadows subdivision, which is presently owned by the Anna Meadows Homeowners Association, Inc.
2. On September 26, 2014, the Staff of the Public Service Commission (Staff) filed its Recommendation which requested the Commission grant MAWC’s request for Certificates of Convenience and Necessity to provide water and sewer service to a modified service area subject to several conditions as described in the Memorandum attached to Staff’s filing.

3. Public Counsel now states that it has no opposition to Staff's conditional recommendation that the Commission issue an Order granting MAWC's request for Certificates of Convenience and Necessity.

4. Public Counsel notes that, as a homeowners' association, Anna Meadows Homeowners Association, Inc. was not subject to the jurisdiction of the Commission, and no previous rate base determination has been made by the Commission. As a result, accurate water and sewer rate base calculations will be very important in MAWC's next rate case regarding the Anna Meadows water and sewer systems. Therefore, Public Counsel stresses the importance that all utility plant documentation related to Anna Meadows Homeowners Association, Inc. be obtained by MAWC through the purchase agreement and maintained for future auditing by Staff and Public Counsel.

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)
Deputy 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 parties of record this 6th day of October 2014.

Missouri Public Service Commission

Kevin Thompson
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Kevin.Thompson@psc.mo.gov

Missouri Public Service Commission

Office General Counsel
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Missouri-American Water Company

Dean L Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Missouri-American Water Company

Timothy W Luft
727 Craig Road
St. Louis, MO 63141
Timothy.Luft@amwater.com

/s/ **Christina L. Baker**
