

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

In the Matter of Confluence Rivers Utility)
Operating Company, Inc.'s Request for)
Authority to Implement a General Rate)
Increase for Water Service and Sewer)
Service Provided in Missouri Service Areas)

File No. WR-2023-0006

**STAFF RESPONSE TO CONFLUENCE RIVERS' PROPOSED TEST YEAR,
UPDATE/KNOWN AND MEASURABLE PERIOD, AND TRUE-UP**

COMES NOW Staff of the Missouri Public Service Commission by and through the undersigned counsel, and for its Response to Confluence Rivers Utility Operating Company, Inc.'s ("Confluence") proposed Test Year, Update/Known and Measurable Period, and True-up Proposal states as follows:

1. As stated in the Commission's *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule* issued on January 3, 2023, "Confluence proposes a test year of the twelve months ending June 30, 2022, and further proposes an updated/known and measurable period through December 31, 2022. Confluence is not proposing a true-up in this case."
2. On January 20, 2023, Staff, OPC, and Confluence held a meeting. During this meeting, the Parties discussed, amongst other things, its parent, Central States Water Resources, Inc. ("CSWR"), and its recent acquisition of water and sewer systems in other states.
3. Staff does not oppose the test year nor the absence of a true-up as proposed by Confluence as set forth in paragraph one above.
4. However, the recent acquisition by CSWR of systems in South Carolina may affect the level of allocated corporate costs to the ratepayers in Missouri. As such,

Staff proposes to change the updated/known and measurable period through January 31, 2023, rather than through December 31, 2022.

5. The Office of Public Counsel does not oppose this Response.

WHEREFORE, Staff respectfully submits this Response to Confluence's proposed Test Year, Updated/Known and Measurable Period and True-up.

Respectfully submitted,

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 2nd day of February, 2023.

/s/ Ron Irving