

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

In the Matter of the Application of Confluence Rivers            )  
Utility Operating Company, Inc., for Authority to                )  
Acquire Certain Water and Sewer Assets and for a                )  
Certificate of Convenience and Necessity                            )  
**File No. WA-2019-0299**

**CONFLUENCE RIVERS' STATEMENT OF POSITION**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers” or “Company”), and for its *Statement of Position* states as follows to the Missouri Public Service Commission (“Commission”):

1.       What is the net book value of the Port Perry Service Company’s (“Port Perry”) water and wastewater assets?

**The net book value (“NBV”) of the Port Perry assets as of December 31, 2019, for purposes of this case, is \$20,070 for water assets, and \$57,866 for sewer assets, for a total of \$77,936.**

2.       Given the answer to the first question, should the Commission find that Confluence Rivers Utility Operating Company, Inc.’s (“Confluence Rivers”) acquisition of the Port Perry Service Company’s (“Port Perry”) water and wastewater assets and certificates of convenience and necessity is not detrimental to the public interest, and approve the transaction?

**Yes. There is no detriment to the public interest associated with the net book value. First, the net book value will not change as the result of the proposed transfer of ownership. Second, Confluence Rivers has not requested an acquisition premium in this case and has waived any opportunity it might have to seek to recover acquisition premium recovery in subsequent rate proceedings related to the Port Perry assets. Thus, any**

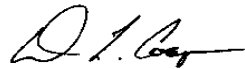
premium paid by Confluence Rivers will not result in a detriment to the public interest because Confluence Rivers will not recover in customer rates any premium amount paid.

Confluence Rivers has the technical, managerial, and financial resources to own and operate the systems to be acquired and to otherwise provide safe and adequate service on a going forward basis. The CSWR family of companies currently provides water or sewerage service to over 35,000 customers serving more than 100,000 people across four states. Confluence Rivers will be able to provide safe and reliable water and sewerage service to the Port Perry community without recovery of any acquisition premium as a result of this transaction.

The Commission should find that Confluence Rivers' acquisition of the Port Perry water and wastewater assets and certificates of convenience and necessity is not detrimental to the public interest and approve the transaction.

WHEREFORE, Confluence Rivers respectfully submits its *Statement of Position*.

Respectfully submitted,



---

Dean L. Cooper, MBE #36592  
Jennifer L. Hernandez, MBE #59814  
**BRYDON, SWEARENGEN & ENGLAND P.C.**  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65012  
(573) 635-7166 telephone  
(573) 636-7431 facsimile  
[jhernandez@brydonlaw.com](mailto:jhernandez@brydonlaw.com)  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

**ATTORNEYS FOR CONFLUENCE RIVERS  
UTILITY OPERATING COMPANY, INC.**

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on May 18, 2020, to the following:

Office of the General Counsel  
[staffcounservice@psc.mo.gov](mailto:staffcounservice@psc.mo.gov)  
[karen.bretz@psc.mo.gov](mailto:karen.bretz@psc.mo.gov)

Office of the Public Counsel  
[opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)  
[john.clizer@opc.mo.gov](mailto:john.clizer@opc.mo.gov)

David Linton  
[dlinton@mlklaw.com](mailto:dlinton@mlklaw.com)

**/s/ Jennifer L. Hernandez**