

**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 Certificates of Convenience and)
Necessity)
File No. WA-2023-0450

RESPONSE TO STAFF RECOMMENDATION

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

1. On June 30, 2023, Confluence Rivers filed an application asking the Commission to grant it Certificates of Convenience and Necessity (“CCNs”) and approval to acquire the sewer system assets of Brussels Valley Estates, Inc. in Lincoln County, Missouri and Mapaville Meadows in Jefferson County, Missouri, and the water and sewer assets of Chevron/Sierra Land Company, LLC (Johnson Bay) in Morgan County, Missouri.

2. On November 28, 2023, Staff filed its *Staff Recommendation* and supporting *Memorandum* suggesting that the Commission approve Confluence Rivers’ acquisition of the subject water and sewer system assets and issue CCNs, subject to 18 conditions described in Staff’s *Memorandum*.

3. Page 20, paragraphs 17 and 18 of Staff’s recommendation propose, in pertinent part, that Confluence “complete repairs and upgrades to the wastewater plant at Brussels, and bring effluent sample readings into DNR compliance within 24 months of closing” and “complete repair to the wastewater plant in Mapaville, and bring effluent sample readings into DNR compliance within 24 months of closing.”

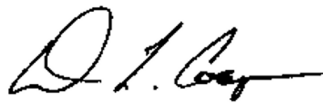
4. The Engineering Team at Confluence Rivers has indicated that it may take thirty (30) months to bring the Mapaville and Brussels Valley plants into compliance, rather than the recommended twenty-four (24) months. Confluence Rivers does not object to the twenty-four-month compliance deadline for Johnson Bay.

5. Counsel for Staff has indicated that Staff is not opposed to granting the additional time to bring the Mapaville and Brussels Valley wastewater assets into compliance.

6. Confluence Rivers has reviewed the remaining proposed conditions listed on pages 19 and 20 of Staff's *Memorandum* and has no objection to those proposed conditions.

WHEREFORE, Confluence Rivers requests the Commission issue an order approving Confluence Rivers' *Application* and granting Confluence Rivers the CCNs as recommended in Staff's *Memorandum*, subject to the Staff conditions with the above-referenced modification of thirty (30) months to bring the Mapaville and Brussels Valley wastewater assets into DNR compliance, and for such other and further relief as deemed appropriate in the circumstances.

Respectfully submitted,



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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 8th day of December 2023, to all counsel of record.

