

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

In the Matter of the Application of Confluence Rivers )  
Utility Operating Company, Inc., for a Certificate of )  
Convenience and Necessity to Provide Sewer Service ) File No. SA-2024-0129  
In an Area of Jefferson County, Missouri )  
(Country Life Acres). )

**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 September 29, 2023, Confluence Rivers filed an application asking the Commission to grant it a Certificate of Convenience and Necessity (“CCN”) and approval to acquire the sewer system assets of Country Life Acres in Jefferson County, Missouri.

2. On December 6, 2023, Staff filed its *Staff Recommendation* and supporting *Memorandum* suggesting that the Commission approve Confluence Rivers’ acquisition of the subject sewer system assets and issue a CCN, subject to 17 conditions described in Staff’s *Memorandum*.

3. Page 12, paragraphs 16 and 17 of Staff’s recommendation propose, in pertinent part, that Confluence “repair the connection between the first and second lagoon cells and remove sludge from the septic tank within the first month of ownership” and “upgrade the treatment system as necessary to achieve compliance with wastewater treatment facility permit discharge limits within 24 months of ownership[.]”

4. The Engineering Team at Confluence Rivers has indicated that it may take three

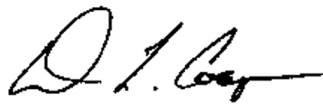
(3) months from the date of ownership to repair the lagoon connection and remove the sludge, and thirty (30) months from the date of ownership to upgrade the treatments system to permit compliance, rather than the recommended one (1) month for the lagoon repair and twenty-four (24) months for treatment system permit compliance.

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

6. Confluence Rivers has reviewed the remaining proposed conditions listed on pages 11 and 12 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 CCN as recommended in Staff's *Memorandum*, subject to the Staff conditions with the above-referenced modification of three (3) months from ownership to repair the lagoon cell connections and remove sludge from the septic tank, and for thirty (30) months from the date of ownership to upgrade the treatment system as necessary to achieve compliance with wastewater treatment facility permit discharge limits, 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 14<sup>th</sup> day of December 2023, to all counsel of record.

  
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