

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

In the Matter of United Services, Inc.'s)
Rate Increase Request) File No. SR-2024-0206

RESPONSE TO MOTION FOR CUSTOMER NOTICE

COMES NOW United Services, Inc. (“United”), through counsel, and for its *Response to Motion for Customer Notice* states as follows:

1. On July 1, 2024, United and the Staff of the Missouri Public Service Commission (“Staff”) filed their *Non-Unanimous Agreement Regarding Disposition of Small Utility Company Revenue Request Increase*.¹

2. On July 11, 2024, the Office of the Public Counsel (“OPC”) filed its *Motion for Customer Notice*, requesting a second notice of rate increase request be sent to United Services, Inc.’s customers and that a 30-day response period occur before the Commission consider issuing an order on the *Non-Unanimous Agreement*.

3. On July 12, 2024, the Commission issued its *Order Setting Time for Responses*, stating that any responses to OPC’s *Motion for Customer Notice* be filed no later than July 22, 2024.

4. United and Staff have followed the procedures established for small companies set out in 20 CSR 4240-10.075 *Staff Assisted Rate Case Procedure*. 20 CSR 4240-10.075(6) and (7) set out requirements regarding local public hearings and a notice to be sent out ahead of local public hearings.

¹ On July 16, 2024, Staff filed a *Notice of Corrected Agreement* and a *Corrected Non-Unanimous Agreement Regarding Disposition of Small Utility Company Revenue Increase Request*. The corrections have no effect on the *Agreement’s* proposed rates.

5. The public notice sent out to customers under 20 CSR 4240-10-0750(7) dated January 22, 2024, specifically stated that:

At this time the amount of any increase to your rates has not been determined. Under the Commission's Staff Assisted Rate Case Procedure for small companies, the Commission's staff will conduct an audit of the Company's books to determine whether the Commission's Staff supports a rate increase, and if so, by what amount. Following this review the Commission will determine what it believes to be just and reasonable rates.

Pursuant to the Commission's Staff Assisted Rate Case Procedure, the Commission will hold a local public hearing regarding proposed changes to the customer rates and charges of the Company. The purpose of this virtual hearing is to receive customer comments about the proposed changes to the Company's rates and charges, and to bring service-related problems to the Commission's attention.²

6. While OPC is correct that the notice sent to customers did not include the specific amount of the proposed rate increase, it stated that United was seeking a rate *increase* and explained the process by which staff would proceed in determining an increase. The notice did not state that United was seeking an increase of \$1.00 or any other specific amount.

7. A virtual public hearing was held on February 20, 2024, and no United Services, Inc.'s customers testified. Additionally, there were no public comments received from customers. No customer testified or commented on either the proposal for an increase, Staff conducting the audit and determining the amount for "just and reasonable rates", or service-related issues.³

8. Nothing in the procedures established to assist small companies in their rate cases as set forth in 20 CSR 4240-10-0750 requires the sending of multiple notifications. There is no requirement of a second notice to be sent once the Staff's audit

² A copy of the Initial Customer Notice was filed in this case on February 9, 2024.

³ A copy of the transcript from the public hearing was filed in this case on March 1, 2024.

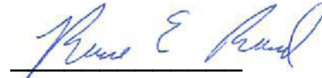
is completed.

9. As noted in Staff's opposition to the motion for a second notice "If a second customer notice were sent, rate case expense would essentially double, and Staff would need to update the proposed amount of rate case expense to be recovered in rates".

10. A second notice and comment period is unnecessary, the process was expressly set out in the required notice of the proposed rate increase and public hearing notice sent to customers and no customer testified or provided comments. A second notice after completion of the audit is not required or provided for in 20 CSR 4240-10.075 and will increase costs to United and its customers, and needlessly delay the implementation of new rates.

WHEREFORE, United respectfully submits this *Response to Motion for Customer Notice* for the Commission's information and consideration and requests that the Commission approve the *Corrected Non-Unanimous Agreement* without a second notice and comment period.

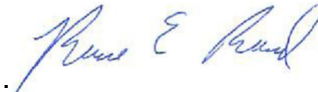
Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of July 2024



Bruce E. Beard