

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

In the Matter of the Joint Application of)
Confluence Rivers Utility Operating)
Company, Inc., and Missouri-American)
Water Company for Authority for)
Confluence Rivers Utility Operating)
Company, Inc. to Acquire Certain Sewer)
Assets of Missouri-American Water)
Company in Callaway and Morgan Counties,)
Missouri)

Case No. SM-2025-0067

MOTION FOR CLARIFICATION

Comes now the Office of the Public Counsel (the “OPC”) and respectfully requests that the Public Service Commission of the State of Missouri (the “Commission”) clarify its Order Setting Procedural Schedule (the “Order,” Doc. 26). Specifically, the OPC requests that the Commission clarify the data request response time beginning on April 22, 2025. In support, the OPC states as follows:

1. On March 4, 2025, the Staff of the Commission (“Staff”) filed a Joint Response to Order (the “Joint Response,” Doc. 25) on behalf of itself, Confluence Rivers Utility Operating Company, Inc., Missouri-American Water Company, and the OPC (collectively, the “Parties”), identifying a proposed procedural schedule for this matter. As a part of that proposed procedural schedule, the Parties requested that beginning on April 22, 2025, the Commission change the response time for data requests to “5 business days to respond.” (Jt. Resp. 2).
2. On March 7, 2025, the Commission issued the Order, stating that it would “adopt the proposed procedural schedule with some additional procedural requirements.” (Order 1).
3. On page 2 of the Order, the Commission identified April 22, 2025, as the date when the response time for data requests changes to “5 *business* days to respond.” (Order 2)

(emphasis added)). However, on page 4, the Commission stated “[s]tarting April 22, 2025, the response time for all data requests shall be five (5) *calendar* days.” (*Id.* 4 (emphasis added)).

4. Therefore, the Order identifies two different deadlines applicable to data request responses beginning April 22, 2025.
5. The OPC requests that the Commission clarify the Order to specify the deadline applicable to data request responses beginning on April 22, 2025.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission clarify the applicable response deadline for data requests beginning April 22, 2025.

Respectfully submitted,

/s/ Lindsay VanGerpen
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 27th day of March 2025.

/s/ Lindsay VanGerpen