

# 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 )  
Water Service in an Area of Pulaski )  
County, Missouri (Leon Travis Blevins )  
a/k/a Travis Blevins and Patricia Blevins, )  
d/b/a Misty Mountain PWS a/k/a Misty )  
Water Works, Charity PWS, and Rolling )  
Hills PWS) )

**Case No. WA-2026-0054**

## **ORDER DIRECTING CONFLUENCE RIVERS TO FILE DOCUMENTATION, DIRECTING DATA CENTER TO SEND DOCUMENTS, AND SETTING A DEADLINE TO INTERVENE**

Issue Date: November 10, 2025

Effective Date: November 10, 2025

On August 29, 2025,<sup>1</sup> Confluence Rivers Utility Operating Company, Inc. (Confluence Rivers) filed an application seeking authority to acquire the Rolling Hills and Charity water systems assets of the currently unregulated systems of Leon Travis Blevins a/k/a Travis Blevins and Patricia Blevins, d/b/a Misty Mountain PWS a/k/a Misty Water Works, Charity PWS, and Rolling Hills PWS (Blevins). Confluence Rivers also seeks a certificate of convenience and necessity (CCN) to operate the systems and provide service to the public. Confluence Rivers does not indicate in its application that it has served Mr. Blevins with a copy of the application and the accompanying appendices. In addition, Blevins is not listed on the Service List for this case in the Commission's Electronic Filing Information System (EFIS).

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<sup>1</sup> Unless otherwise noted, all date references are to the year 2025.

Confluence Rivers' application states that its parent company, Central States Water Resources, Inc., entered into an agreement with Blevins on December 16, 2024, to purchase the Rolling Hills and Charity water systems assets and then to assign its rights under the agreement to Confluence Rivers at closing. The application goes on to state that, after execution of the agreement, Confluence Rivers has been unable to contact Blevins and has received no responses to its inquiries and requests for information.

On September 2, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention, and Directing Staff Recommendation* in this matter. No applications to intervene were received. On October 20, Staff filed its *Staff Recommendation*, in which it recommended the Commission approve Confluence Rivers' acquisition of the Blevins' water systems assets and grant the CCN, subject to certain conditions. No parties objected to Confluence Rivers' application or Staff's recommendation.

The Commission will direct Confluences Rivers to provide documentation showing their efforts to contact Mr. Blevins. Furthermore, the Commission will direct its Data Center to send Mr. Blevins a copy of this order, Confluence Rivers' application, and Staff's recommendation. Finally, the Commission will set a deadline for Mr. Blevins to intervene in this matter.

**THE COMMISSION ORDERS THAT:**

1. No later than December 1, 2025, Confluence Rivers shall file documentation showing efforts to contact Blevins subsequent to December 16, 2024.

2. Using the Commission's last known contact information for Leon Travis Blevins and Patricia Blevins in EFIS, the Commission's Data Center shall send, via e-mail and the United States Postal Service, public copies of (1) this Order; (2) the *Application and Motion for Waiver* (with publicly available appendices) filed by Confluence Rivers on August 29, 2025; and (3) the *Staff Recommendation* filed October 20, 2025, with attached *Memorandum*.

3. If Mr. Blevins wishes to intervene in this matter, he shall file a motion to intervene, including the requirements listed in Commission Rule 20 CSR 4240-2.075, no later than December 10, 2025.

4. This order is effective when issued.



**BY THE COMMISSION**

*Nancy Dippell*

Nancy Dippell  
Secretary

Kenneth J. Seyer, Regulatory Law Judge,  
by delegation of authority pursuant to  
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,  
on this 10<sup>th</sup> day of November, 2025.

**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 Water Service In an Area of Pulaski )  
County, Missouri (Leon Travis Blevins a/k/a )  
Travis Blevins and Patricia Blevins, d/b/a Misty )  
Mountain PWS a/k/a Misty Water Works, Charity )  
PWS, and Rolling Hills PWS). )

**File No. WA-2026-**

**APPLICATION AND MOTIONS FOR WAIVER**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) pursuant to Sections 393.170, RSMo, 20 CSR 4240-2.060, 20 CSR 4240-50.060, and 20 CSR 4240-4.017, and for its *Application and Motion for Waiver*, states as follows to the Missouri Public Service Commission (“Commission”):

**INTRODUCTION**

1. Confluence Rivers is a Missouri corporation with its principal office and place of business at 1630 Des Peres Rd., Suite 140, St. Louis, MO 63131. Confluence Rivers is a Missouri corporation in good standing. A certified copy of Confluence Rivers’ certificate of good standing was filed in File No. WM-2018-0116 and is incorporated herein by reference.

2. Confluence Rivers provides water service to approximately 6,400 connections and sewer service to approximately 6,500 connections in the State of Missouri, pursuant to certificates of convenience and necessity previously granted by the Commission. Confluence Rivers is a “water corporation,” a “sewer corporation,” and a “public utility,” as those terms are defined in Section 386.020, RSMo, and is subject to the jurisdiction and supervision of the Commission as provided by law.

3. Confluence Rivers has no overdue Commission annual reports or assessment fees. There is no pending action or final unsatisfied judgment or decision against Confluence Rivers from any state or federal agency or court that involves customer service or rates, which action, judgment or decision has occurred within three years of the date of this Application.

4. Communications regarding this application should be addressed to the undersigned counsel and to:

Aaron Silas, Director of Regulatory and Customer Operations  
Confluence Rivers Utility Operating Company, Inc.  
1630 Des Peres Rd., Suite 140  
St. Louis, MO 63131  
Phone: (314) 380-8510  
E-mail: [asilas@cswrgroup.com](mailto:asilas@cswrgroup.com)

### **THE PROPOSED SALE TRANSACTION**

5. Confluence Rivers proposes to acquire the Rolling Hills and Charity water systems assets of the currently unregulated systems of Leon Travis Blevins a/k/a Travis Blevins and Patricia Blevins, d/b/a Misty Mountain PWS a/k/a Misty Water Works, Charity PWS, and Rolling Hills PWS (“Blevins”). Confluence Rivers seeks a Certificate of Convenience and Necessity (“CCN”) to operate the systems and provide service to the public.

6. On August 21, 2024, the Commission issued its *Report and Order* in a complaint case filed by the Staff of the Commission (“Staff”) (File No. WC-2023-0353). The Commission found Blevins was operating a water corporation and public utility providing water for gain without certification where such certification is required by Missouri statute. The order also determined that because Blevins was unable to provide safe and adequate water service it was necessary for the Commission to direct its General Counsel to petition the Circuit Court to appoint a receiver to take control of Blevins’ water systems.

7. In response, the General Counsel of the Commission filed a *Verified Petition of Injunction* in the Circuit Court of Pulaski County, Missouri, on October 16, 2024 (Case No. 24PU-CV01695). The Court subsequently issued an *Order Granting Injunction* on December 2, 2024.

8. The General Counsel of the Commission also filed a *Petition to Attach the Assets of a Non-Compliant Water System and to Appoint a Receiver* in the Circuit Court of Pulaski County, Missouri, on October 17, 2024 (Case No. 24PU-CV01704). Blevins' response to the *Petition* indicated that he had agreed to sell certain assets to CSWR. The receivership case remains pending.

9. On December 16, 2024, Central States Water Resources, Inc. ("CSWR") entered into an *Agreement for Sale of Utility System* ("*Agreement*") with Blevins. A copy of the *Agreement* is attached as **Appendix A-C** and marked Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A).3 and .6, as it contains market-specific information and information representing strategies employed in contract negotiations. (20 CSR 4240-50.060(3)(A)12). CSWR proposes to purchase from Blevins the Rolling Hills and Charity water systems, as specifically described in and under the terms and provisions of the *Agreement*.

10. Pursuant to Paragraph 18 of the *Agreement*, CSWR plans to assign its rights under the *Agreement* to Confluence Rivers at closing. **Appendix B** verifies the authority of Josiah Cox, the President of Confluence Rivers, to enter into the *Agreement* and seek Commission approval of the transaction.

### **MOTION FOR WAIVER REGARDING CERTAIN REQUIREMENTS**

11. After the execution of this *Agreement*, Confluence Rivers has been unable to contact Blevins and has received no responses to its inquiries and requests for information. Accordingly, as noted below, some of the information called for by Commission Rule 20 CSR

4240-50.060 is not available to Confluence Rivers and not supplied with this Application. Therefore, Confluence Rivers requests a waiver from those provisions of Commission Rule 20 CSR 4240-50.060 for which it must rely on Blevins to supply the required information.

### **CERTIFICATE OF CONVENIENCE AND NECESSITY**

12. Blevins owns and/or operates three water systems - Misty Mountain, Rolling Hills and Charity -- in Pulaski County, Missouri. This Application concerns the Rolling Hills and Charity water systems. The facilities are regulated by the Missouri Department of Natural Resources (“DNR”) under permits Nos. MO-3036361 (Charity) and MO-3036362 (Rolling Hills).

13. The Rolling Hills water system is located in Pulaski County approximately 7 miles west of Waynesville. The facility serves approximately 17 connections across a 276-acre service area consisting of a residential subdivision. The system consists of 1 deep water well within the service area. The existing facility has had frequent monitoring/reporting violations, but no maximum contaminant violations are shown in Missouri drinking water records. (20 CSR 4240-50.060(3)(A)3).

14. The Charity water system is located in Pulaski County approximately 7 miles northeast of St. Robert. The facility serves approximately 18 connections across a 130-acre residential subdivision. The system consists of 3 deep water wells spread out across the service area. (20 CSR 4240-50.060(3)(A)7). The existing facility has had frequent monitoring/reporting violations, but no maximum contaminant violations are shown in Missouri drinking water records. (20 CSR 4240-50.060(3)(A)3).

15. There are no customers currently being served by Blevins that are located in the service area of another water provider. (20 CSR 4240-50.060(3)(A)7).

16. After acquisition, Confluence Rivers plans operation or capital improvements to

the water system. (20 CSR 4240-50.060(3)(A)4). Attached hereto and marked as **Appendix C1-C** and **Appendix C2-C** are the Engineering Memorandum concerning the Rolling Hills and Charity facilities that provides a description of those improvements to the water systems, including the reason for the improvements, estimated cost of capital improvements, and a proposed timeline for completion of the improvements. **Appendix C1-C and Appendix C2-C** have been identified as “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)3. and 6., as they contain market-specific information and information representing strategies employed in contract negotiations.

17. Confluence Rivers requests permission, approval and a CCN to construct, install, own, operate, maintain, control and manage water systems for the public in an area of Pulaski County, Missouri, as an addition to its existing service territories. Legal descriptions of the areas sought to be certificated are attached hereto as **Appendix D1** and **Appendix D2**. (20 CSR 4240-50.060(3)(A)1). Maps of the areas sought to be certificated are attached as **Appendix E1** and **Appendix E2**. (20 CSR 4240-50.060(3)(A)2).

18. There are no known communications with existing customers. (20 CSR 4240-50.060(3)(A)5).

19. Within twenty (20) days after the filing of this Application, Confluence Rivers will provide notice to all potential customers within the designated service area. An example of this customer notice is attached hereto as **Appendix-F**. (20 CSR 4240-50.060(2)).

#### **ADDITIONAL INFORMATION**

20. Attached hereto and marked as **Appendix G-C** is a feasibility study for the Rolling Hills and Charity water systems for which Confluence Rivers seeks a CCN, with the proposed method for financing, proposed rates, service charges, revenues and expenses during the first three



years of operation by Confluence Rivers. (20 CSR 4240-50.060(3)(A)6). **Appendix G-C** has been identified as “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A).3 and .6 as it contains market specific information and information representing strategies employed in contract negotiations.

21. **Appendix G-C** includes an estimate of the costs to operate the system, including copies of any available support documentation. (20 CSR 4240-50.060(3)(A)9). **Appendix G-C** has been identified as “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A).3 and .6 as it contains market specific information and information representing strategies employed in contract negotiations.

22. Confluence Rivers has attempted to contact the seller and has been unable to obtain financial statements, general ledgers, invoices, or billing registers for the Blevins’ water systems for the previous five (5) years. (20 CSR 4240-50.060(3)(A)10).

23. Attached hereto and marked as **Appendix H-C** is a rate base calculation following the commission approved Uniform System of Accounts (USOA) requirements with workpapers and supporting documentation for the assets to be acquired. (20 CSR 4240-50.060(3)(A)11). **Appendix H-C** has been identified as “Confidential” in accordance with Commission Rule 20 CSR 4240-2.135(2)(A).3 and .6 as it contains market specific information and information representing strategies employed in contract negotiations.

24. Confluence Rivers believes an acquisition premium does exist and Confluence Rivers intends to seek recovery of such premium in future rates. (20 CSR 4240-50.060(3)(A)13).

25. Confluence Rivers is not aware of any franchises or permits from municipalities, counties, or other authorities that would be required in order to provide service in the requested area. (20 CSR 4240-50.060(4)).

### **TARIFF/RATES**

26. Confluence Rivers would further plan to submit tariff sheets, to be effective before closing on the assets, to include a service area map, service area written description, and rates to be included in its EFIS tariff P.S.C. MO No. 30, applicable to water service.

27. Confluence Rivers proposes to utilize the existing customer rate of \$55.00 per month for all customers of Blevins. Based on the Report and Order referenced above, Blevins has stated that the price he charges for water is \$55.00 per month for existing customers and \$60.00 for new customers. There is an additional charge of \$15.00 per month if the customer owns a pool.

28. The water systems will require investment after purchase by Confluence Rivers that will necessarily result in a future request for a rate increase of some amount.

### **PUBLIC INTEREST**

29. The grant of the requested CCN (and approval of the underlying transactions) is in the public interest and results in regulated water service being provided to the current and future residents of the Blevins service areas. The systems would be acquired by Confluence Rivers, a Missouri public utility, and be subject to the jurisdiction of the Commission. As demonstrated to the Commission in past cases, Confluence Rivers, with the support and assistance of its affiliates, is fully qualified, in all respects, to own and operate the water systems for which the certificate is sought. Confluence Rivers' successful operation of other water and sewer systems in Missouri demonstrates its ability to provide safe and reliable service to customers and to comply with the Commission's rules, regulations, and decisions governing the ownership and operation of such system. Confluence Rivers also has the financial strength and resources necessary to make expenditures and investments required to maintain the systems.

## **MOTION FOR WAIVER**

30. Commission Rule 20 CSR 4240-4.017(1) requires “[a]ny person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case.” Because it did not file such a notice within the time period prescribed by that rule, Confluence Rivers seeks a waiver of the 60-day pre-filing notice requirement.

31. Under Rule 20 CSR 4240-4.017(1)(D), a waiver of the pre-filing notice requirement may be granted for good cause. In this regard, Confluence Rivers declares, as verified below, that it has had no communication with the Office of the Commission (as defined in 20 CSR 4240-4.015(10)) within the prior 150 days regarding any substantive issue likely to be in this case. Good cause for the requested waiver exists in accordance with Commission Rule 20 CSR 4240-4.017(1)(D) (“Good cause for waiver may include, among other things, a verified declaration from the filing party that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case...”).

32. Therefore, as authorized by Rule 20 CSR 4240-4.017(1)(D), Confluence Rivers moves for a waiver of the 60-day notice requirement and acceptance of this application at this time.

**WHEREFORE**, for the reasons previously stated, Confluence Rivers respectfully requests the Commission issue an order:

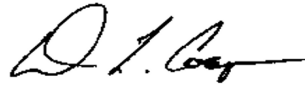
(A) Waiving the 60-day notice requirement of Rule 20 CSR 4240-4.017(1) for good cause shown;

(B) Granting Confluence Rivers a CCN authorizing it to install, acquire, build, construct, own, operate, control, manage, and maintain water distribution systems for the public within the Rolling Hills and Charity water systems described herein;

(C) Authorizing Confluence Rivers to acquire the Rolling Hills and Charity water system assets of Blevins, as described in this *Application and Motion for Waiver*; and

(D) Granting such other relief as may be deemed necessary and appropriate to accomplish the purposes of the *Agreement*, the *Application and Motion for Waiver*, and consummate related transactions in accordance with the *Agreement*.

Respectfully submitted,



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Dean L. Cooper MBE #36592

**BRYDON, SWEARENGEN & ENGLAND P.C.**

312 E. Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102

(573) 635-7166 telephone

[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

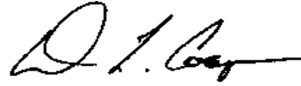
**ATTORNEYS FOR CONFLUENCE RIVERS  
UTILITY OPERATING COMPANY, INC.**

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail this 29<sup>th</sup> day of August 2025, to the following:

Staff Counsel Division  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

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



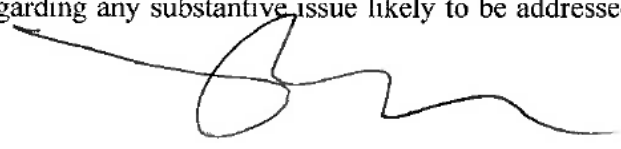
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Dean L. Cooper

**AFFIDAVIT**

State of Missouri     )  
                                  )  
County of St. Louis    )     ss

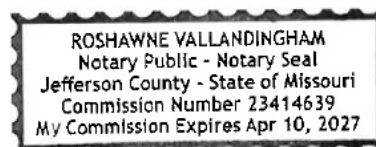
I, Josiah Cox, having been duly sworn upon my oath, state that I am the President of Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers"), that I am duly authorized to make this affidavit on behalf of Confluence Rivers, that I have knowledge of the matters stated herein, and that said matters are true and correct to the best of my information, knowledge, and belief. Additionally, no representative of Confluence Rivers has had any communication with the Office of the Missouri Public Service Commission as defined in Commission Rule 20 CSR 4240-4.015(10) within the one hundred fifty (150) days immediately preceding the filing of the Application regarding any substantive issue likely to be addressed in this case.



Subscribed and sworn before me this 28<sup>th</sup> day of August, 2025.

  
Notary Public

My Commission Expires 04-10-2027



**APPENDIX A-C**

**HAS BEEN  
IDENTIFIED AS**

**CONFIDENTIAL**

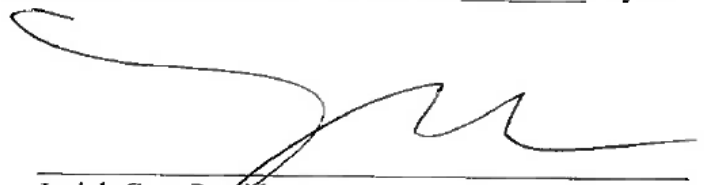
**IN ITS ENTIRETY PURSUANT TO  
20 CSR 4240-2.135(2)(A)3. and 6.**

## APPENDIX B

### VERIFICATION OF AUTHORITY

COMES NOW the undersigned, the President of Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers") and Central States Water Resources, Inc. ("CSWR"), and does hereby verify that CSWR had and has the requisite authority to enter into each *Agreement for Sale of Utility System* described in the Application and to carry out all the obligations contained in each *Agreement for Sale of Utility System*.

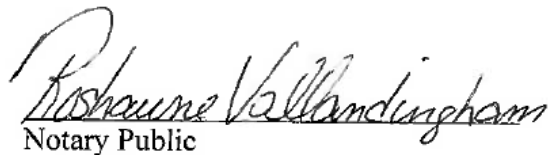
IN WITNESS WHEREOF, the undersigned has hereto set his hand the 28<sup>th</sup> day of August, 2025.



Josiah Cox, President  
CONFLUENCE RIVERS UTILITY OPERATING  
COMPANY, INC. and CENTRAL STATES  
WATER RESOURCES, INC.

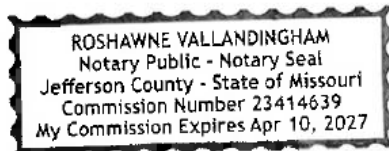
State of Missouri     )  
                                  )     ss  
County of St. Louis    )

Subscribed and sworn before me this 28<sup>th</sup> day of AUGUST, 2025.



Notary Public

My Commission Expires 04-10-2027





**APPENDIX C1-C and C2-C**

HAVE BEEN  
IDENTIFIED AS

**CONFIDENTIAL**

IN THEIR ENTIRETY PURSUANT TO  
20 CSR 4240-2.135(2)(A)3. and 6.

## APPENDIX D1

### Rolling Hills Service Area

The area served is part of Pulaski County, Missouri and being more particularly described as follows:

Commencing from the northwest corner of Section 35, Township 36 North, Range 13 West of the 5<sup>th</sup> P.M.; thence along the west line of said Section 35, Southerly 2256.40 feet more or less to the point of beginning; thence leaving the west line of said Section 35, S82°46'21"E 605.26 feet more or less; thence S83°04'37"E 259.06 feet more or less; thence S85°11'24"E 637.91 feet more or less; thence S82°20'13"E 88.93 feet more or less; thence N72°23'59"E 718.19 feet more or less; thence S89°37'25"E 38.74 feet to the east right-of-way line of Rolling Hills Lane; thence along the east right-of-way line of Rolling Hills Lane, Southerly 650.63 feet more or less; thence leaving said east right-of-way line of Rolling Hills Lane, S89°06'09"E 977.78 feet more or less; thence S0°57'15"W 1123.88 feet more or less; thence N89°41'13"W 1147.29 feet more or less; thence N83°13'24"W 27.36 feet more or less to the west right-of-way line of Rustler Lane; thence along said west right-of-way line of Rustler Lane, Northerly 1162.41 feet more or less; thence leaving said west right-of-way line of Rustler Lane, S3°43'54"W 596.32 feet more or less; thence N89°32'03"W 1215.22 feet more or less to the west line of said Section 35; thence along the west line of said Section 35, Northerly 1717.73 feet more or less to the point of beginning, containing 107.03 acres more or less.

## APPENDIX D2

### Charity Service Area

The area served is part of Pulaski County, Missouri and being more particularly described as follows:

Commencing from the northwest corner of Section 32, Township 37 North, Range 10 West of the 5<sup>th</sup> P.M.; thence along the north line of said Section 32, Easterly 2225.07 feet more or less to the point of beginning; thence leaving said north line of Section 32, N0°49'21"E 90.32 feet more or less; thence S89°12'42"E 548.64 feet more or less; thence S89°18'34"E 280.23 feet more or less; thence S89°44'31"E 311.37 feet more or less; thence S0°28'36"E 750.13 feet more or less to the north right-of-way line of Charity Drive; thence along said north right-of-way line of Charity Drive, Easterly 561.71 feet more or less; thence leaving said north right-of-way line, S2°09'20"W 1970.32 feet more or less; thence N71°32'07"W 1636.47 feet more or less; thence S89°56'11"W 196.81 feet more or less; thence S20°17'21"E 537.13 feet more or less; thence N89°34'11"W 591.36 feet more or less; thence N21°32'59"W 473.22 feet more or less to the south right-of-way line of Covenant Drive; thence along said south right-of-way line, Easterly 49.27 feet more or less; thence leaving said south right-of-way line of Covenant Drive, N19°11'56"W 54.28 feet more or less to the north right-of-way line of said Covenant Drive; thence along said north right-of-way line Westerly 138.92 feet more or less; thence leaving said north right-of-way line of Covenant Drive, N20°34'49"W 399.14 feet more or less; thence N55°55'50"E 279.54 feet more or less; thence N33°15'09"W 198.81 feet more or less; thence S56°02'19"W 1115.37 feet more or less to the east right-of-way line of Highway "PP"; thence along the east right-of-way line of Highway "PP", Northerly 863.28 feet more or less; thence leaving said east right-of-way line of Highway "PP", N40°45'17"E 946.05 feet more or less; thence S64°02'27"E 290.81 feet more or less to the north right-of-way line of Charity Drive; thence along said north right-of-way line of Charity Drive, Easterly 1134.59 feet more or less; thence leaving said north right-of-way line of Charity Drive, N40°37'10"E 440.77 feet more or less; thence S57°03'00"E 162.82 feet more or less; thence N0°03'52"W 234.51 feet more or less to the point of beginning, containing 157.13 acres more or less.

**APPENDIX E1 and E2**

HAVE BEEN  
FILED SEPARATELY

## **APPENDIX F**

HAS BEEN  
FILED SEPARATELY

**APPENDIX G**

HAS BEEN  
IDENTIFIED AS

**CONFIDENTIAL**

IN ITS ENTIRETY PURSUANT TO  
20 CSR 4240-2.135(2)(A)3. and 6.

**APPENDIX H**

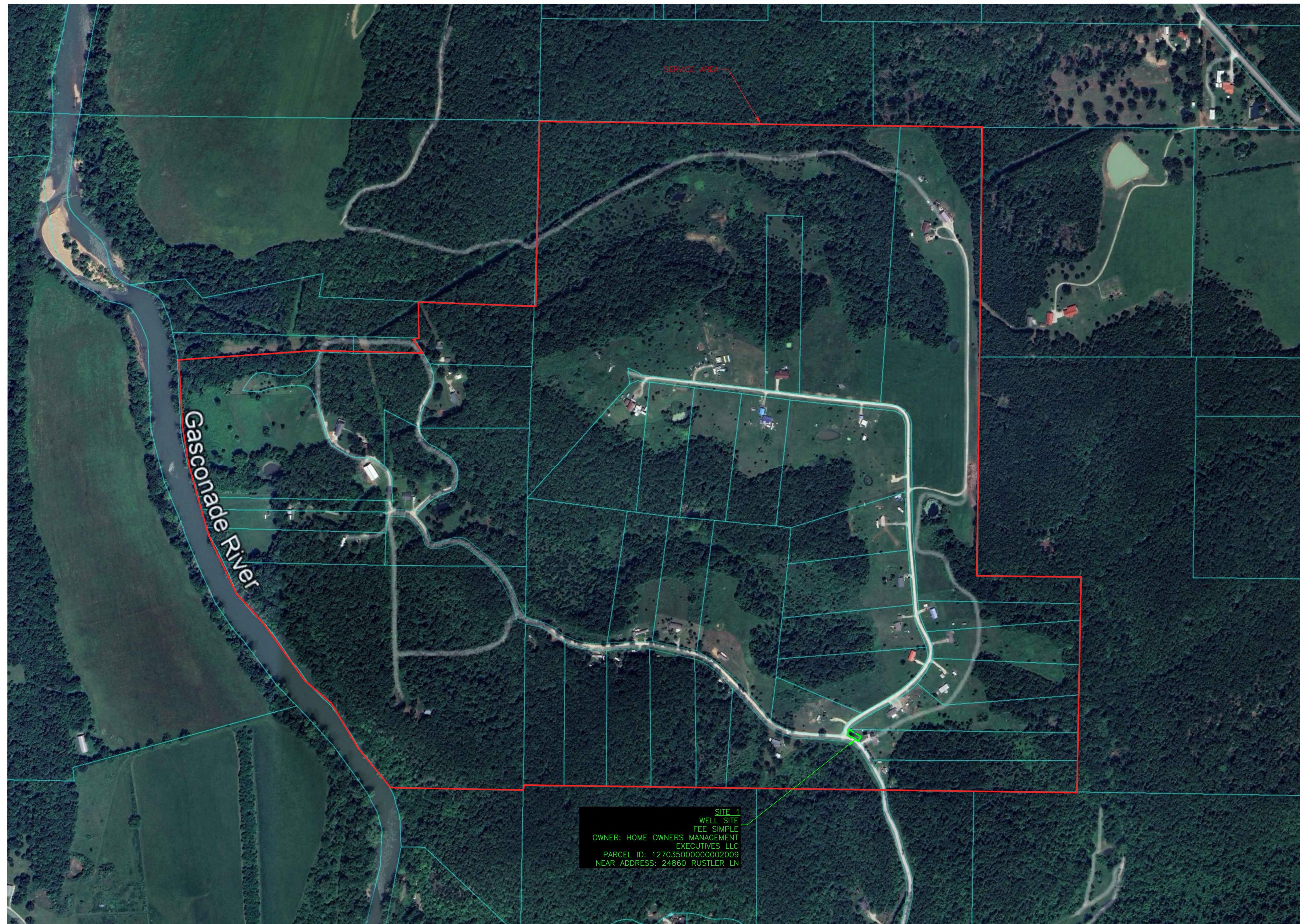
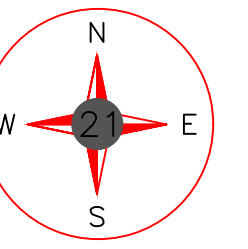
HAS BEEN  
IDENTIFIED AS

**CONFIDENTIAL**

IN ITS ENTIRETY PURSUANT TO  
20 CSR 4240-2.135(2)(A)3. and 6.



ROUGH SERVICE AREA MAP  
LEON BLEVINS - PULASKI - ROLLING HILLS  
(WATER)  
PULASKI COUNTY, MO



Utility Note Disclaimer:

The service area shown hereon are depicted based on a service area map provided by the system manager. 21 Design Group, Inc. performed no field verification of the layout and are unable to determine the exact location at this time. The location represents approximate location only and should not be construed as being 100% accurate. It is shown to provide general service area of the system to assist with ordering title work and preparation of scope for a License Land Surveyor. This sketch should not be used to interpret encroachments.

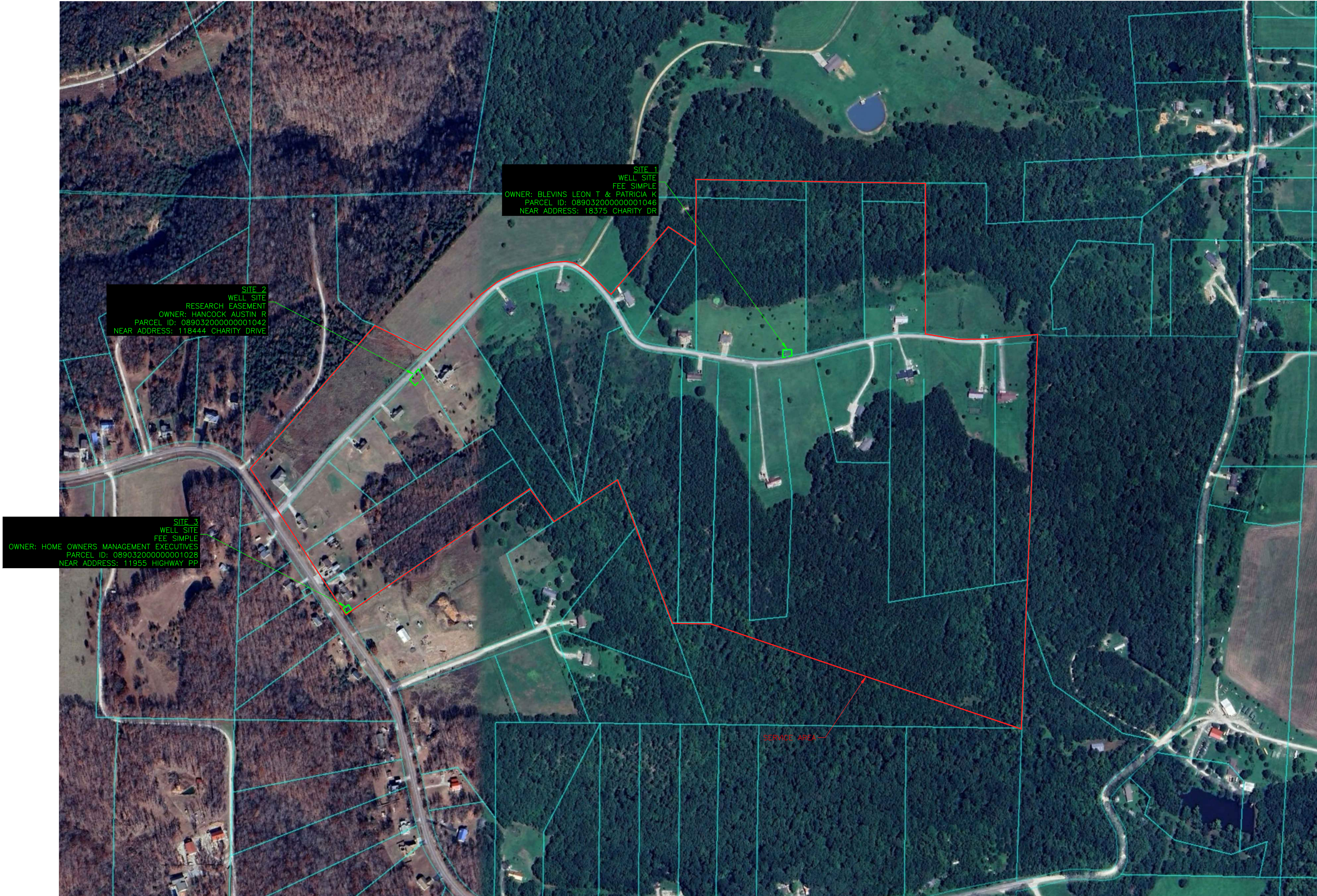
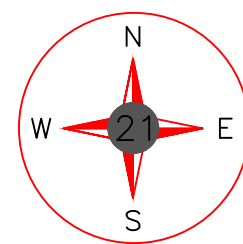
DATE:	06/12/2025
PROJECT NO:	0596-25
DRAWN BY:	AMD
SCALE:	
SHEET NAME:	SERVICE AREA MAP

**21**  
DESIGN  
GROUP INC.

1351 Jefferson, Suite 301  
Washington, MO 63090  
mail@21designgroup.net  
P: 636-432-5029



ROUGH SERVICE AREA MAP  
LEON BLEVINS - PULASKI - CHARITY  
(WATER)  
PULASKI COUNTY, MO



Utility Note Disclaimer:

The service area shown hereon are depicted based on a service area map provided by the system manager. 21 Design Group, Inc. performed no field verification of the layout and are unable to determine the exact location at this time. The location represents approximate location only and should not be construed as being 100% accurate. It is shown to provide general service area of the system to assist with ordering title work and preparation of scope for a License Land Surveyor. This sketch should not be used to interpret encroachments.

DATE:	06/12/2025
PROJECT NO:	0596-25
DRAWN BY:	AMD
SCALE:	
SHEET NAME:	
SERVICE AREA MAP	

**21**  
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**CONFLUENCE RIVERS**

Utility Operating Company

A CSWR Managed Utility

**DATE**, 2025

Dear Resident:

As a private-owned, regulated water and wastewater utility in the state of Missouri, Confluence Rivers Utility Operating Company works closely with the Missouri Public Utilities Commission (MoPSC) when applying for approval to acquire an existing system.

We are currently applying for approval to pursue the purchase of two Leon Blevins water facilities: Rolling Hills and Charity. Our proposed monthly flat rate is \$55, subject to change pending approval.

This pre-purchase (acquisition) process provides an opportunity for the public to track the progress of the case located in the Commission's electronic filing information system (EFIS), as well as to submit comments. To track case progress, visit <https://psc.mo.gov/general/efis>. Click on "Docket Sheet" under the heading "EFIS Shortcuts" and enter **Case No. [Insert Docket No.]**.

Comments may be submitted electronically at [https://psc.mo.gov/General/Submit\\_Comments](https://psc.mo.gov/General/Submit_Comments). From this webpage, click "Submit comments" under the heading "Submit Comments in Writing". When submitting comments, please refer to **the File Number [Insert Docket No.]**.

In addition, you may also provide comments to the Office of the Public Counsel (OPC), a state agency tasked with representing the interests of the public in proceedings before the MoPSC. You may contact the OPC by phone at 866-922-2949 toll-free, or 573-751-4857. You may also email them at [opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov).

We have been transforming water and wastewater systems in the state of Missouri since 2014. To see the types of challenges we tackle and how we improve the systems we acquire, visit the Community Impact section of our website ([confluenceriversuoc.com](http://confluenceriversuoc.com)) where we share several case studies and a short video showcasing the behind-the-scenes work that helps make systems stronger, more resilient, and future-ready.

We look forward to serving your community in the near future.

Sincerely,

Confluence Rivers Utility Operating Company

**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               )  
Authorizing it to Provide Water Service In an Area   )  
of Pulaski County, Missouri (Leon Travis Blevins   )  
a/k/a Travis Blevins and Patricia Blevins, d/b/a       )  
Misty Mountain PWS a/k/a Misty Water Works,       )  
Charity PWS, and Rolling Hills PWS)                   )

**File No. WA-2026-0054**

**STAFF RECOMMENDATION**

**COMES NOW** the Public Service Commission Staff (“Staff”), by and through counsel, and recommends that the Commission grant to Confluence Rivers Utility Operating Company (“Confluence” or the “Company”) a Certificate of Convenience and Necessity (“CCN”) to provide regulated water services in an area of Pulaski County, Missouri (Leon Travis Blevins a/k/a Travis Blevins and Patricia Blevins, d/b/a Misty Mountain PWS a/k/a Misty Water Works, Charity PWS, and Rolling Hills PWS) (“Blevins systems”). In support of this *Recommendation*, Staff states as follows:

1. On August 29, 2025, Confluence filed its *Application and Motion for Waiver* (“Application”) seeking a Certificate of Convenience and Necessity (“CCN”) for authority to acquire the Rolling Hills and Charity water systems assets of the currently unregulated Blevin’s systems located in an area of Pulaski County, Missouri.

2. On September 2, 2025, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation*, setting an intervention deadline of September 17, 2025, and ordering Staff to file its recommendation regarding Confluence’s Application no later than October 20, 2025. No intervention requests were received.

3. Pursuant to § 393.170.2, RSMo, no water or sewer corporation shall provide service to consumers without first having obtained approval from the Commission. In determining whether or not to grant such approval, the Commission has traditionally applied the following five “Tartan Criteria” established in *In the Matter of Tartan Energy Company, et al.*, 3 Mo. PSC 3d 173, 177 (1994): (1) there must be a need for the service; (2) the applicant must be qualified to provide the service; (3) the applicant must have the financial ability to provide service; (4) the applicant’s proposal must be economically feasible; and (5) the service must promote the public interest.

4. As explained in the Staff *Memorandum*, attached hereto as Appendix A, Staff conducted an investigation into Confluence’s request. Based upon its review, Staff concludes that Confluence fulfills the requirements of the Tartan Criteria.

5. Accordingly, Staff recommends approval granting the CCN, with conditions described in the Staff *Memorandum*, as granting the requested CCN would be necessary and convenient for the public service.

6. The Commission need not hold a hearing if, after proper notice and opportunity to intervene, no party requests such a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494 (Mo. App. W.D. 1989). No party or individual has requested a hearing, so the Commission need not hold a hearing to grant a CCN to the Company.

**WHEREFORE**, Staff respectfully submits this Staff Recommendation for the Commission’s information and consideration, and requests the Commission grant Confluence Rivers Utility Operating Company a Certificate of Convenience and Necessity, with conditions, to provide water service to the requested service area.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

Missouri Bar Number 45718

Senior Staff Counsel

Missouri Public Service Commission

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[Carolyn.kerr@psc.mo.gov](mailto:Carolyn.kerr@psc.mo.gov)

Attorney for Staff of the

Missouri Public Service Commission

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 20th day of October, 2025, to all counsel of record.

**/s/ Carolyn H. Kerr**

## **MEMORANDUM**

**TO:** Missouri Public Service Commission  
Official Case File, Case No. WA-2026-0054  
Confluence Rivers Operating Company, Inc

**FROM:** Sherrye Lesmes – Auditing Department  
Charles Tyrone Thomason – Customer Experience Department  
Kelli Malki – Financial Analysis Department  
Jarrod J. Robertson – Water and Sewer Department  
Adam Stamp – Water and Sewer Department

/s/ Jarrod Robertson 10-20-2025  
Case Manager / Date

**SUBJECT:** Staff's Recommendation to Approve Request for Certificate of Convenience and Necessity

**DATE:** October 20, 2025

### **EXECUTIVE SUMMARY & CASE BACKGROUND**

On August 21, 2024, the Missouri Public Service Commission (“Commission”) issued its *Report and Order* in a complaint case filed by the Staff of the Commission (“Staff”) (Case No. WC-2023-0353). The Commission determined Leon Travis Blevins a/k/a Travis Blevins and Patricia Blevins, d/b/a Misty Mountain Public Water System a/k/a Misty Water Works, Charity Public Water System, and Rolling Hills Public Water System (“Blevins”), was operating a water corporation and public utility providing water for gain without certification where such certification is required by Missouri Statute. The order also determined that due to Blevins being unable to provide safe and adequate water service it was necessary for the Commission to direct its General Counsel to petition the Circuit Court to appoint a receiver to take control of Blevins’ water systems.

Because Mr. Blevins had stated that he intended to begin disconnecting customers for nonpayment, the General Counsel of the Commission (“General Counsel”) filed a *Verified Petition of Injunction*

in the Circuit Court of Pulaski County, Missouri, on October 16, 2024, Case No. 24PU-CV1695). The Circuit Court subsequently issued an *Order Granting Injunction* on December 2, 2024.

The General Counsel also filed a *Petition to Attach the Assets of a Non-Compliant Water System and to Appoint a Receiver* (“Petition”) in the Circuit Court of Pulaski County, Missouri, on October 17, 2024 (Case No. 24PU-CV01704). Belvins’ response to the *Petition* indicated that he had agreed to sell certain assets to Central States Water Resources, Inc. (“CSWR”). This receivership case remains pending.

On August 29, 2025, Confluence Rivers Utility Operating Company, Inc. (“Confluence”), a subsidiary of CSWR, filed an *Application and Motion for Waiver* (“Application”) with the Commission for a Certificate of Convenience and Necessity (“CCN”) authorizing it to install, own, acquire, construct, operate, control, manage, and maintain certain water systems in Pulaski County, Missouri, specifically, two currently unregulated Blevins water systems, namely, the Rolling Hills and Charity water systems (collectively, “Systems”). In its CCN Application, Confluence states that it intends to acquire substantially all the water utility assets associated with the previously mentioned water Systems, presently owned and operated by Blevins.

On September 2, 2025, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention, and Directing Staff Recommendation* (“Order”) in the CCN case. The Commission established an initial date of October 20, 2025, by which Staff would file a status report or a recommendation regarding the Application.

No parties sought to intervene in the case. No public comments have been submitted.

Staff recommends approval of the Application.

## **BACKGROUND OF CONFLUENCE**

Confluence is a “water corporation,” a “sewer corporation,” and a “public utility,” as those terms are defined in Section 386.020, RSMo, subject to the jurisdiction and supervision of the Commission as provided by law, with its principal office and place of business at 1630 Des Peres Rd., Suite 140, St. Louis, Missouri 63131. Confluence is a subsidiary of CSWR

and currently provides water service to approximately 6,400 customers and sewer service to approximately 6,500 customers in several service areas throughout Missouri. In recent years, Confluence has acquired several existing small water and sewer systems.

### **BACKGROUND OF BLEVINS**

Travis Blevins has owned and/or operated multiple water systems in Pulaski County, Missouri. This CCN Application concerns the Rolling Hills and Charity water systems. These facilities are currently regulated by the Missouri Department of Natural Resources (“DNR”) under Permit Nos. MO3036362 (Rolling Hills) and MO3036361 (Charity). According to the Engineering Report submitted with the Application, each System has had frequent monitoring/reporting violations, but has registered no maximum contaminant violations. Although the Systems meet the DNR threshold to be considered a public water supply system, and have for some time, the DNR has stated in multiple communications to Staff that Mr. Blevins has historically strived to avoid regulation. Therefore, a reliable history of water quality records for these systems does not exist. DNR became involved with Mr. Blevins in 2023 after receiving a high volume of complaints and concerns from his customers regarding their water service.

It should also be noted that other water systems operated by Mr. Blevins and constructed in the same manner as the Rolling Hills and Charity systems do have a history of water quality issues and safety concerns. These concerns are believed to arise from poor construction practices during well installation. According to DNR, the wells that Mr. Blevins operates were constructed without a construction permit, are generally considered to be undersized, were built using substandard materials, and are poorly maintained.

### **BACKGROUND OF ROLLING HILLS**

Located in Pulaski County, Missouri, approximately seven miles west of Waynesville, Missouri, drinking water for the Rolling Hills neighborhood is supplied via a single deep water well. The facility serves approximately 17 connections across a 276-acre service area consisting of a residential subdivision. The water system will likely require large upgrades to many of its components to be considered adequate. These upgrades are detailed below. The distribution



system may require significant replacement, and there are no easements for the current distribution system.

### **BACKGROUND OF CHARITY**

Located in Pulaski County, Missouri, approximately seven miles northeast of St. Robert, Missouri, via three deep water wells, the facility serves approximately 18 connections across a 130-acre residential subdivision. Like Rolling Hills, the Charity water system will require a large amount of equipment investments as only one of its three supply wells is currently operational. The distribution system may require significant replacement, and there are no easements for the current distribution system. The system also lacks adequate storage.

### **STAFF'S INVESTIGATION**

On December 16, 2024, CSWR entered into an *Agreement for Sale of Utility System* ("Agreement") with Blevins.

After the execution of this Agreement, representatives of Confluence stated they have been unable to contact Blevins and have received no responses to their inquiries and requests for information. Accordingly, as noted below, some of the information called for by Commission Rule 20 CSR 4240-50.060 is not available to Confluence and not provided in its Application. Therefore, Confluence requests a waiver from those provisions of Commission Rule 20 CSR 4240-50.060 for which it must rely on Blevins to supply the required information.

### **Rolling Hills**

#### **Summary of Proposed Improvements**

The Rolling Hills water system will require multiple upgrades to be considered adequate. According to the Engineer Report submitted with the CCN Application, the existing hydropneumatic tank volume is inadequate according to Minimum Design Standards for Missouri Community Water Systems ("MDS"). Per section 7.4.2. (b), of the MDS, there should be 35 gallons of gross volume available per person served when the pressure range is 40-60 psi. The existing water treatment facility has approximately 172 gallons of gross volume available.

As approximately 48 people live in the subdivision, the system would require a minimum 1,680 gallons of gross volume to comply with the MDS. As the existing well house is not large enough to house a new hydropneumatic storage tank of that size, a new well house will need to be constructed. The distribution system will likely need considerable investment as well. A detailed outline of the proposed improvements, per the Engineering Report submitted with the CCN Application, are as follows:

Well Improvements and Other Repairs:

- Installation of a new pre-engineered building to be used as the new well house;
- Installation of a new hydropneumatic storage tank with a minimum gross volume of approximately 1,700 gallons;
- Installation of a new remote monitoring system equipped with a pressure transducer and a magnetic flow meter to allow for monitoring flow demand and run time of the well;
- Tests should be performed to determine yield capacity and water quality for the existing well. Sampling has continued to show no issues with bacteria over an extended period of time, so disinfection should not be necessary unless water quality testing data shows otherwise;
- A manual transfer switch should be installed to allow for the use of a generator quick connect during power outages.

Water Distribution System:

Investigation will need to be conducted to verify the locations and sizes of water mains and valves. There are no hydrants within the system.

Water Distribution System Improvements and Other Repairs:

- Replacement of valves as necessary, following investigation;
- A hydraulic model will need to be prepared based on the high-grade variance, as there will be a wide range of pressures across the system and knowing problem areas will be crucial to operation. The western portion of the subdivision is much lower in elevation compared to the eastern portion;

- As grade varies across the service area from 1,089 to 884 feet, we anticipate that pressure relief valves placed at strategic locations throughout the distribution network will be necessary. These locations would be determined during the hydraulic modeling process.

## **Charity**

### **Summary of Proposed Improvements**

The Charity water system contains three wells, but only one of them is currently in service. DNR drinking water regulations do not require that the two wells be brought back into service, but it should be considered as a backup option. According to the Engineering Report submitted with the CCN Application, the existing hydropneumatic tank volume is inadequate according to the MDS. Per section 7.4.2. (b) of the MDS, there should be 35 gallons of gross volume available per person served when the pressure range is 40-60 psi. The existing water treatment facilities combined have approximately 377 gallons of gross volume, however 119 gallons are currently in use (Well #2). As approximately 55 people live in the subdivision, the system would require a minimum 1,925 gallons of gross volume to comply with minimum design standards. As none of the existing well houses are large enough to house a new hydropneumatic storage tank of that size, a new well house will need to be constructed. A detailed outline of the proposed improvements, as per the Engineering Report submitted with the CCN Application are as follows:

#### **Well #1 Improvements and Other Repairs:**

- The well is not currently in service; however, consideration should be given to using it as a backup well if necessary. While drinking water regulations in Missouri do not require additional wells for systems serving a population lower than 500, using this well could be advantageous if any issues with pressure arise due to the high-grade variance between Well #2 and the eastern half of the subdivision which is closer to Well #1. The operator did not discuss any pressure issues at the time of the site visit;
- Construction of a new well house and various upgrades would be necessary if this well were to be used as a backup. The existing well house consists of a small concrete structure, and

the majority is buried below grade. A larger structure would be needed to house the hydropneumatic tank and other appurtenances;

- Tests should be performed to determine yield capacity and water quality for the existing well;

#### Well #2 Improvements and Other Repairs:

- Installation of a new pre-engineered building to be used as the new well house;
- Installation of a new hydropneumatic storage tank with a minimum gross volume of approximately 2,000 gallons. A hydropneumatic tank of this size would have an outer diameter of approximately 5'-0" and an overall length of 15'-0";
- Installation of a new remote monitoring system equipped with a pressure transducer and a magnetic flow meter to allow for monitoring flow demand and run time of the well;
- Tests should be performed to determine yield capacity and water quality for the existing well. Sampling has continued to show no issues with bacteria over an extended period of time, so disinfection should not be necessary unless water quality testing data indicates otherwise;
- A manual transfer switch should be installed to allow for the use of a generator quick connect during power outages;

#### Well #3 Improvements and Other Repairs:

- The well is not currently in service; however, consideration should be given to using it as a backup well if necessary. While drinking water regulations in Missouri do not require additional wells for systems serving a population lower than 500, using this well could be advantageous if any issues arise with pressure or high demand;
- Construction of a new well-house and various upgrades would be necessary if this well were to be used as a backup. A larger structure would be needed to house the hydropneumatic tank and other appurtenances.
- Tests should be performed to determine yield capacity and water quality for Well #3.

**Water Distribution System:**

Investigation will need to be conducted to verify the locations of water mains and valves. Per the owner, the distribution system consists of mainly 1.5” and 2” polyvinyl chloride (“PVC”) pipe. There are no hydrants within the system.

**Water Distribution System Improvements and Other Repairs:**

- Replacement of valves as necessary, following investigation;
- A hydraulic model will need to be prepared based on the high-grade variance and the number of wells, as there will be a wide range of pressures across the system and knowing problem areas will be crucial to operation;
- As grade varies across the service area from 991 to 917 feet, we anticipate that pressure relief valves placed at strategic locations throughout the distribution network will be necessary. These locations would be determined during the hydraulic modeling process.

**Public Awareness**

Due to the injunction actions taken by the Circuit Court of Pulaski County, as well as the petition to appoint a receiver and filing of a complaint by the Commission, the System customers have been aware of the situation surrounding Blevins, and these Systems. As unregulated water utility systems, with no by-laws in place, the customers are not afforded a vote in this proposed sale. The System customers were provided with a Customer Notice by Confluence, 20 days following the filing of this CCN Application.

**Rate Base**

**Plant-In-Service Balances**

The Auditing Department reviewed information provided by Confluence in response to Staff’s data requests, Confluence’s Application which included sale agreement documents, Confluence’s work papers, and on-site visits made by Staff. Normally, the Auditing Department would review plant-in-service records maintained by the county for its water systems to determine the current

net book value of its assets. However, in this case, the Auditing Department was unable to do this due to lack of records kept by the county. Staff had to supplement estimates for plant when no records were available to determine the current net book value of the Systems' assets.

Staff determined the value of net plant investment, or "rate base," by reviewing the documentation provided by Confluence, and considering whether plant facilities or money was contributed by customers or land developers. Staff's analysis determined there was no indication that plant facilities or money has been contributed by customers or land developers. Thus, there is no Contributions In Aid of Construction ("CIAC") to consider in this case. In the absence of county records and original invoices; Staff's analysis agrees that the purchase price of \*\* [REDACTED] \*\* for the Systems, is approximately the net book value of the Systems' assets, as of August 30, 2025. Without documentation to determine when the Systems' assets were placed in service, they are presumed to be fully depreciated resulting in a net zero rate base value for those assets.

The following is a breakdown of the rate base components:

	Water
Plant in Service	** [REDACTED] **
Accumulated Depreciation	\$0
CIAC	0
Net Plant minus CIAC	** [REDACTED] **
CIAC Amortization	0
Net Rate Base	** [REDACTED] **

If Confluence provides additional information, Staff will re-calculate its rate base calculation to determine revenue requirement in Confluence's subsequent rate case filing.

### **Depreciation**

In Confluence's last rate case, Case No. WR-2024-0006, the Commission ordered the continued use of the depreciation rates currently ordered for all divisions of Confluence. Staff recommends the use of these rates for all plant in the proposed Confluence service area.

### **Financial Analysis**

Staff evaluated whether Confluence has the financial capability to acquire the unregulated water system assets of the Charity and Rolling Hills systems, and to upgrade, own, operate, maintain, and otherwise manage the Systems. The purchase price of the acquisition is \*\* [REDACTED] \*\*, <sup>1</sup> with a total estimated project cost of \*\* [REDACTED] \*\* after repairs and upgrades.<sup>2</sup> Confluence has stated that it possesses “the financial strength and resources necessary to make expenditures and investments required to maintain the systems.”<sup>3</sup>

Staff’s review of Confluence’s pro forma financial statements indicates that the anticipated cost of the project will be funded through equity infusions from its parent company, CSWR, as well as borrowings from CSWR. Borrowed funds are classified by Confluence as “Payable to Associated Companies” on its balance sheet.<sup>4</sup> Although this item appears in the Long-Term Liabilities section, Confluence has confirmed that such borrowings currently have no repayment schedule, interest requirement, or other formal financing terms, and further considers “Payable to Associated Companies” as equity when calculating its debt-to-capital ratios.<sup>5</sup>

Confluence also indicated that, as the company works toward achieving a 50/50 capital structure, it assumes half of the total project cost will ultimately be financed with debt.<sup>6</sup> In that scenario, any funding received from CSWR to support the project could be treated as short-term debt, subject to the same terms and interest rates that CSWR itself may incur in the future.<sup>7</sup>

Because the funding for this acquisition and related improvements will be provided by the parent company (i.e., CSWR), Staff reviewed the current financial and business risk profiles of both Confluence and CSWR, as well as the potential impact of this project on the credit quality of each company. This review was necessary to determine whether reliance on the parent company for

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1 Appendix A-C, The Application.

2 Appendix G-C, The Application.

3 Paragraph 29, The Application.

4 Confluence’s response to Data Request No. 0007.3 in case WF-2023-0023.

5 Ibid.

6 Confluence’s response to Data Request No. 0005.

7 Ibid.

funding creates additional financial risk for Confluence, or whether the strength of CSWR's financial position mitigates the risks associated with Confluence's leveraged profile.

Although neither Confluence nor CSWR are publicly traded, a review of their financial ratios shows the following:<sup>8</sup>

### Confluence Rivers

		<u>As of June 30, 2025</u>		<u>Pro Forma</u>	
		<u>Financial Risk</u>		<u>Financial Risk</u>	
Debt/EBITDA	**		**	**	**
(x)					
Debt/Capital	**		**	**	**
(%)					

### CSWR

		<u>As of June 30, 2025</u>		<u>Pro Forma</u>	
		<u>Financial Risk</u>		<u>Financial Risk</u>	
Debt/EBITDA	**		**	**	**
(x)					
Debt/Capital	**		**	**	**
(%)					

A review of Confluence's and its parent company's financial ratios shows that both companies' Debt-to-Earnings Before Interest, Taxes, Depreciation, and Amortization ("EBITDA") ratios increase on a pro forma basis. These ratios are classified as "Highly Leveraged," indicating a higher level of debt relative to earnings and limited debt coverage. In contrast, the financial statements show a modest decrease in Confluence's and CSWR's Debt-to-Capital ratios.

Because both Confluence and its parent report negative Funds From Operations ("FFO"), their FFO-to-Debt ratios are negative.<sup>9</sup> Negative FFO-to-Debt ratios are atypical, as this metric is generally positive,<sup>10</sup> and therefore these ratios do not provide a meaningful indication of the companies' financial positions.

<sup>8</sup> Confluence's response to Data Requests No. 0001, No. 0002, and Malki's Workpaper.

<sup>9</sup> Ibid.

<sup>10</sup> FFO/Debt ratios typically range from less than 12 for "Highly Leveraged" risk companies to greater than 60 for



For the period 2023–2027, Confluence projected an average annual capital expenditure of \*\* [REDACTED] \*\*, <sup>11</sup> while its parent company, CSWR, projected an average annual capital expenditure of \*\* [REDACTED] \*\*. <sup>12</sup> The total purchase price of the merger represents less than 1% of Confluence’s projected average annual capital expenditures and less than 0.1% of CSWR’s. <sup>13</sup> Similarly, the total estimated project cost is less than 42% of Confluence’s projected average annual capital expenditures and less than 1% of CSWR’s.

Staff notes that these capital expenditure plans are based on older projections. Confluence indicated it could not provide updated forecasts for itself or its parent but did provide Confluence’s most recent Capital Improvement Plan (“CIP”). <sup>14</sup> Staff reviewed and broke down this list provided by year, which totals approximately \*\* [REDACTED] \*\* over the five-year period of 2025-2029, with annual expenditures averaging \*\* [REDACTED] \*\*. <sup>15</sup> While meaningful for Confluence, these project costs are modest compared to the financial capacity of CSWR.

A review of the historical financial statements of both Confluence and CSWR indicates that each has generally maintained sufficient funds to support acquisition- and merger-related expenditures. However, both Confluence and CSWR have consistently reported negative net income from 2020 to the present, as well as in the pro forma projections. <sup>16</sup>

In recent years, the water and sewer sector has experienced an expansion in both the geographic footprint of transactions and the diversity of acquirers of water and wastewater systems nationwide. <sup>17</sup> Given sector demographics, the majority of water utility acquisition activity is

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“Minimal” risk companies.

11 Confluence’s response to Data Request No. 0005 as a part of Case No. WA-2023-0398.

12 Confluence’s response to Data Request No. 0183 as a part of Case No. WR-2023-0006.

13 The percentage of the purchase cost (\*\* [REDACTED] \*\*) from the average five-year capital expenditure provided by Confluence in case WR-2023-0006 (\*\* [REDACTED] \*\*)

14 Confluence’s response to Data Request No. 0004.

15 Confluence’s response to Data Request No. 0004 and Malki’s Workpaper.

16 Confluence’s response to Data Request No. 0001, No. 0002, & No. 0002.1 as a part of Case No. WA-2023-0398 and Confluence’s response to Data Request No. 0001.

17 S&P Capital IQ Pro, “Water acquisitions less frequent, larger in 2023”, published December 5, 2023:

<https://www.spglobal.com/market-intelligence/en/news-insights/research/water-acquisitions-less-frequent-larger-in-2023>

expected to continue stemming from the acquisitions of financially challenged, small private systems and municipal utility systems by the largest investor-owned utilities.<sup>18</sup>

A review of the merger and acquisition cases filed by Confluence during fiscal years 2023-2026 shows that, within those four years, Confluence filed 18 CCN and merger and acquisition (“M&A”) cases, seven of which involved joint sewer and water systems.<sup>19</sup>

The total purchase cost for all 18 of Confluence’s most recent CCN and M&A cases is approximately \*\* [REDACTED] \*\*, <sup>20</sup> which is about eightfold Confluence’s average annual projected capital expenditures for the period 2023–2027, but less than 10% of CSWR’s average annual projected capital expenditures. The total estimated project cost of Confluence’s 18 CCN and M&A cases filed between fiscal years 2023–2026, including this case, is approximately \*\* [REDACTED] \*\*. <sup>21</sup> This amount is roughly eighteenfold Confluence’s average annual projected capital expenditures but represents only about 21% of CSWR’s.

When compared to Confluence’s future Capital Improvement Plan (“CIP”), the combined purchase costs of these eighteen cases represent approximately 25% of Confluence’s total planned CIP expenditures, while the total project costs represent approximately 56%. This indicates that although the scope of Confluence’s acquisition activity is large relative to its own historical capital expenditures, the activity remains manageable in the context of its forward-looking capital improvement planning and is modest when compared to the financial capacity of its parent company, CSWR.

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18 S&P Capital IQ Pro, “Water utility transactions trickle in while long-term demand remains elevated”, published July, 14, 2023: [https://www.spglobal.com/market-intelligence/en/news-insights/research/water-acquisitions-less-frequent-larger-in-2023?utm\\_source=chatgpt.com](https://www.spglobal.com/market-intelligence/en/news-insights/research/water-acquisitions-less-frequent-larger-in-2023?utm_source=chatgpt.com)

19 These Cases include: WA-2023-0003, WA-2023-0026/SA-2023-0027, WA-2023-0092/SA-2023-0093, SA-2023-0187, SA-2023-0215, WA-2023-0284/SA-2023-0285, WA-2023-0398/SA-2023-0396, SA-2023-0437, and WA-2023-0450/SA-2023-0451, WA-2024-0048/SA-2024-0049, SA-2024-0129, SM-2024-0130, SA-2024-0307, WA-2025-0012/SA-2025-0013, WM-2025-0065, SM-2025-0067, SM-2025-0080, & WA-2026-0054.

20 Malki’s Workpaper; Review of applications and corresponding data requests of all FY 2023-2026 Confluence merger and acquisition cases. Purchase costs were taken from purchase agreements provided in the application and totaled.

21 Malki’s Workpaper; Review of applications and corresponding Data Requests of all FY 2023-2026 Confluence merger and acquisition cases. Estimated Total Project Costs were taken from the feasibility study included with the application or requested as a part of a Data Request.

These findings indicate that Confluence has pursued a relatively aggressive growth strategy through its recent acquisition activity. However, with the financial support of its parent company, CSWR, Confluence appears capable of accommodating and managing the risks associated with these practices.<sup>22</sup> In addition, the trend of larger, financially stronger companies acquiring smaller, financially challenged water and sewer systems is consistent with industry patterns observed nationwide.<sup>23</sup>

While Staff has concerns regarding Confluence's "Highly Leveraged" financial risk profile, the company's debt-to-capital ratio shows modest improvement in the pro-forma. Additionally, the projected total cost of this acquisition will be funded by CSWR through a combination of debt and equity and represents less than 1% of CSWR's projected average annual capital expenditure. Furthermore, CSWR's financial risk profile is mostly unchanged by this transaction.

Based on this information, Staff finds no evidence that CSWR is unable to provide the financial support necessary for Confluence to purchase, upgrade, own, operate, maintain, and otherwise control and manage the Charity PWS and Rolling Hills PWS systems. Therefore, it is Staff's opinion that Confluence, with the financial backing of its parent company, CSWR, is financially capable of undertaking the acquisition and improvements requested in the application.

### **Publicity and Customer Notice**

On September 17, 2025, Confluence Rivers mailed notice to the residents served by the Systems, notifying them of the proposed acquisition.<sup>24</sup>

### **Customer Service and Billing**

Customers may contact Confluence's customer service department by calling the toll-free phone number 866-945-3920 or by sending an email to customer service. There is also a toll-free phone

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22 Confluence's response to Data Request No. 0001 shows all costs associated with this case coming from their parent company, CSWR.

23 S&P Global Market Intelligence, "Water acquisitions less frequent, larger in 2023," December 5, 2023, <https://www.spglobal.com/market-intelligence/en/news-insights/research/water-acquisitions-less-frequent-larger-in-2023>

24 WA-2026-0054, *Notice of Mailing*.

number available for emergency calls. The emergency number, the website, and email are available 24/7. According to Confluence, this information is provided on the customer brochure, the website, and all written materials sent to customers. Confluence's main office is located at 1630 Des Peres Road, Suite 140, St. Louis, Missouri 63131 and is open Monday through Friday from 8:00am to 5:00pm. The main office's customer service personnel are also available to be contacted after hours for escalated emergency calls.

Confluence will offer payment options including check, money order, cashier's check, debit card, credit card, e-check, Apply Pay, Google Pay, PayPal Cash, and Check Free Pay.

In order to incorporate the Systems' customers into its billing and customer service systems, it will be necessary for Confluence to properly enter the appropriate customer information into its systems and apply the Commission-approved rates.

### **Rate and Tariff Matters**

Confluence proposes submitting tariff sheets to be effective before closing on the assets, to include service area maps, service area legal descriptions, rates and charges to be included in P.S.C. MO No. 30, applicable to water service, until such time as the rates and rules are modified.

While there is a county public water supply district, the district has stated to Staff they do not have the ability to provide service to these Blevins customers and have no intention of extending service to these areas.

Confluence also proposes charging the existing customers the current System's flat rate of \$55.00 per month, and provide water service pursuant to the existing rates and rules governing the rendering of water service currently found in Confluence's water tariff P.S.C. MO No. 30.

Staff recommends that after approval, but before Confluence closes on the utility assets, Confluence submit all applicable new or revised water tariff sheets for Staff review, including the service area map and legal description. This type of review prior to filing can enable a smooth process for Commission approval of the tariff sheets.

### **Technical, Managerial, and Financial Capacity**

In studying most situations involving transfers of assets and CCNs involving existing regulated water and/or sewer systems, Staff utilizes the concepts of technical, managerial, and financial capacity, or “TMF,” originally developed by the U.S. Environmental Protection Agency. Staff has reviewed and stated its position regarding TMF regarding Confluence in previous CCN and transfer of assets cases before the Commission. Staff again reviewed Confluence’s TMF capabilities in the context of this application, and takes the position that Confluence continues to demonstrate adequate TMF capability.

#### **Technical Capacity**

As noted above, Confluence is an existing regulated water and sewer utility currently providing water service to approximately 6,400 connections and sewer service to approximately 6,500 connections in several service areas throughout Missouri. Confluence has acquired several small existing water and sewer systems, and – as a subsidiary of CSWR – is affiliated with other companies that undertake some of the tasks associated with utility service, such as customer billing, and technical resources. As such, it is Staff’s position that Confluence has the requisite technical capacities to acquire and operate these two water systems, as well as complete the necessary maintenance proposed by Confluence for these facilities.

#### **Managerial Capacity**

Confluence intends to incorporate the two water systems to be acquired into its current billing and customer service system. Confluence’s current customer service representatives will be available to take and process customer inquiries pertaining to billing and/or service issues, make necessary bill adjustments, enter into payment plans within company guidelines, interact with Staff in working with customer complaints, and manage new customer accounts and the closing of customer accounts. In the operation of its current systems, Confluence has demonstrated the requisite managerial abilities to operate the proposed two water Systems.

### **Financial Capacity**

Confluence has the financial capacity to acquire, operate, and complete the recommended maintenance of the two water systems through access to capital through its upstream affiliates. Its parent company, CSWR, owns several water and sewer utilities in several states. It is Staff's opinion, based upon its current operations and past acquisitions, that Confluence has demonstrated that it has the requisite financial capacity to acquire, operate, and complete the recommended maintenance of the two water Systems proposed to be acquired.

Staff's position on Confluence's ability to meet TMF criteria remains positive, in that Confluence has adequate TMF capacity in this case. Staff determined that Confluence has the ability to secure funding, to oversee construction of any necessary upgrades or repairs, and the ability to successfully manage operations of the Systems.

### **Tartan Criteria**

When considering a request for a new CCN, the Commission applies criteria originally developed in a CCN case filed by the Tartan Energy Company (Case No. GA-94-127) and referred to now as the "Tartan criteria." The Tartan criteria contemplate: 1) the need for service; 2) the applicant's qualifications; 3) the applicant's financial ability; 4) the economic feasibility of the proposal; and, 5) promotion of the public interest. Similar to the TMF capacities in previous CCN cases, Staff investigated these criteria, and that investigation relates to this proposed acquisition. The results of Staff's investigation are outlined below:

#### **(1) Need for Service**

There is both a current and future need for water service as the existing customer base in the Rolling Hills and the Charity systems have both a desire and need for service. In addition, there is a need for the necessary steps to be taken to update each of the Systems, and to ensure the provision of safe and adequate service.

## **(2) Applicant's Qualifications**

Confluence is an existing water and sewer corporation and public utility subject to the jurisdiction of the Commission. Confluence is currently providing water service to approximately 6,500 customers in several service areas throughout Missouri. Confluence is a subsidiary of CSWR and is affiliated with other CSWR companies that undertake some of the tasks associated with utility service, such as customer billing, and technical resources. Through its current operation of utility systems Confluence has demonstrated its qualifications to operate the Blevins systems.

## **(3) Applicant's Financial Ability**

Confluence anticipates no need for external financing to complete this acquisition and has demonstrated over many years that it has adequate resources to operate utility systems it owns, to acquire new systems, to undertake construction of new systems and expansions of existing systems, to plan and undertake scheduled capital improvements, and to timely respond and resolve emergency issues when such situations arise.

## **(4) Feasibility of the Proposal**

The fourth Tartan Criteria calls for an evaluation of the economic feasibility of the proposal. Additionally, it is Staff's opinion that the feasibility of the engineering and operational aspects of the proposal must be addressed as well. As such, both are addressed here.

Confluence has demonstrated over numerous years that it has adequate resources to operate utility systems it owns. The current rates, which Confluence is adopting, may not be sufficient to support the cost of service and will be evaluated as part of the next Confluence rate case after this acquisition. Confluence has demonstrated they have access to sufficient capital to invest the needed upgrades at these systems, and it is not expected that such investment will cause financial burden for Confluence. Staff does not have any evidence that CSWR cannot provide the necessary support for Confluence to purchase, upgrade, own, operate, maintain, and otherwise control and manage these systems.

Staff evaluated the proposals for upgrading the systems in order to provide safe and adequate service, and finds them to be reasonable. Issuance of a CCN for Confluence to operate the Systems

would enable improvements regarding the provision of safe and adequate service via upgrades to distribution, monitoring/testing, water quality, storage, back-up power, and being operated by a DNR licensed operator. Confluence will also conduct such testing and capacity calculations to determine if additional wells must be constructed. Confluence has demonstrated over numerous years that it has adequate resources to operate utility systems it owns. The current rates, which Confluence is adopting, were designed to support the cost of service. Staff does not have any evidence that CSWR cannot provide the necessary support for Confluence to purchase, upgrade, own, operate, maintain, and otherwise control and manage the Systems.

#### **(5) Promotion of the Public Interest**

Staff finds that due to the positive nature of the preceding criteria, coupled with the present and future need for utility service, this proposed acquisition promotes the public interest. Customers of Mr. Blevins have been dealing with inadequate service and potentially hazardous health situations for multiple years, while also paying rates that have been subject to seemingly random increases. These water systems were poorly constructed from the beginning and have now been used for an estimated 20 years. System failures and outages have been prevalent since Staff started investigating the situation in 2023, and Staff still receives calls from customers on a near weekly basis asking for assistance. It is abundantly clear that this acquisition will promote the public interest.

Staff's conclusion is that all Tartan Energy criteria are met for this case.

Staff's conclusion is that Confluence satisfies the TMF capacities and the Tartan Energy criteria. Staff further finds that approving utilities' the sale to Confluence is not detrimental to the public interest and that issuance of a CCN to Confluence is necessary or convenient for the public service. Staff recommends the Commission authorize Confluence to enter into, execute, and perform in accordance with the terms described in the Purchase Agreement, attached as Appendix A to Confluence's Application. Staff further recommends Confluence be granted a CCN to provide water service in the territories currently served by Blevins.



### **OTHER ISSUES**

The Systems, as unregulated water operations, have no obligations due to the Commission, and have no pending actions before the Commission.

Confluence is a corporation that is in “good standing” with the Missouri Secretary of State.

Confluence is current with annual report filings with the Commission through calendar year 2024, as documented on the Commission’s Electronic Filing and Information System (“EFIS”).

Confluence is current on its annual assessment quarterly payments through the second quarter of fiscal year 2025.

Confluence has other pending cases before the Commission, but none that would impact this decision.

### **STAFF RECOMMENDATIONS AND CONCLUSIONS**

Staff’s position, based on its review as described herein, is that the transfer of utility assets is not detrimental to the public interest. Staff therefore recommends the Commission authorize the transfer of the Rolling Hills and Charity system assets to Confluence. In light of all Tartan Criteria having been fulfilled, Staff also recommends that the Commission grant Confluence new CCNs for the acquired Systems at issue in this case. These recommendations are subject to the conditions and actions as outlined herein:

Staff recommends the Commission find that Confluence has complied with the requirements of §393.320, RSMo, and approve Confluence’s request for CCN, subject to the following conditions and actions:

1. Grant Confluence a CCN to provide water service in the proposed Rolling Hills and Charity system service areas, as modified as outlined herein;
2. Approve Confluence’s proposed water rates for the Systems;
3. Require Confluence to submit tariff sheets, to become effective before closing on the assets, to include a service area map, service area legal description, rates and charges to be included in its EFIS tariff P.S.C. MO No. 30, applicable to water service, respectively;

4. Require Confluence to notify the Commission of closing on the assets within five (5) days after such closing;
5. If closing on the water Systems' assets does not take place within thirty (30) days following the effective date of the Commission's order approving such, require Confluence to submit a status report within five (5) days after this thirty (30) day period regarding the status of closing, and additional status reports within five (5) days after each additional thirty (30) day period, until closing takes place, or until Confluence determines that the transfer of the assets will not occur;
6. If Confluence determines that a transfer of the assets will not occur, require Confluence to notify the Commission of such no later than the date of the next status report, as addressed above, after such determination is made, and require Confluence to submit tariff sheets as appropriate that would cancel service area maps and descriptions applicable to each System's service areas in its water tariff, and rate and charges sheets applicable to customers in each System's service areas in the water tariff;
7. Require Confluence to keep its financial books and records for plant-in-service and operating expenses in accordance with the NARUC Uniform System of Accounts;
8. Require Confluence to adopt the depreciation rates ordered in Case No. WR-2024-0006;
9. Require Confluence Rivers to provide training to its call center personnel regarding rates and rules applicable to the Systems' customers;
10. Require Confluence Rivers to distribute to the Systems' customers an informational brochure detailing the rights and responsibilities of the utility and its customers consistent with the requirements of Commission Rule 20 CSR 4240-13, within thirty (30) days of closing on the assets;
11. Require Confluence Rivers to provide to the Customer Experience Department ("CXD") Staff an example of its actual communication with the Systems' customers regarding its acquisition and operations of the water, and how customers may reach Confluence Rivers, within ten (10) days after closing on the assets;

12. Require Confluence Rivers to include the Systems' customers in its established monthly reporting to the CXD Staff on customer service and billing issues, on an ongoing basis, after closing on the assets;
13. Require Confluence Rivers to provide the CXD Staff a sample of five (5) billing statements from the first three month's billing for the Systems within ten (10) days of the billings;
14. Require Confluence Rivers to file notice in this case outlining completion of the above-recommended training, customer communications, notifications and billing within ten (10) days after such communications and notifications; and,
15. Make no finding that would preclude the Commission from considering the ratemaking treatment to be afforded any matters in any later proceeding.

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

In the Matter of the Application of	)	
Confluence Rivers Utility Operating	)	Case No. WA-2026-0054
Company, Inc., for a Certificate of	)	
Convenience and Necessity to Provide	)	
Water Service in an Area of Pulaski County,	)	
Missouri (Leon Travis Blevins a/k/a Travis	)	
Blevins and Patricia Blevins, d/b/a Misty	)	
Mountain PWS a/k/a Misty Water Works,	)	
Charity PWS, and Rolling Hills PWS)	)	

**AFFIDAVIT OF SHERRYE LESMES**

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

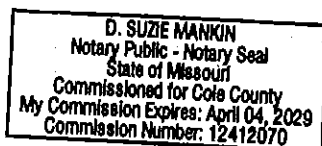
COMES NOW SHERRYE LESMES and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief.

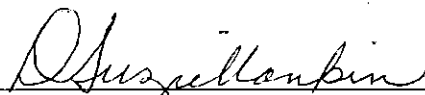
Further the Affiant sayeth not.

  
\_\_\_\_\_  
SHERRYE LESMES

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16<sup>th</sup> day of October 2025.



  
\_\_\_\_\_  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
Confluence Rivers Utility Operating ) Case No. WA-2026-0054  
Company, Inc., for a Certificate of )  
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Blevins and Patricia Blevins, d/b/a Misty )  
Mountain PWS a/k/a Misty Water Works, )  
Charity PWS, and Rolling Hills PWS) )

**AFFIDAVIT OF KELLI MALKI**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW KELLI MALKI** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief.

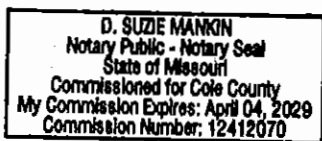
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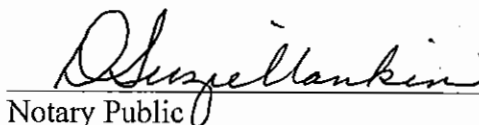


**KELLI MALKI**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16<sup>th</sup> day of October 2025.



  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

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Mountain PWS a/k/a Misty Water Works, )  
Charity PWS, and Rolling Hills PWS) )

**AFFIDAVIT OF JARROD J. ROBERTSON**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

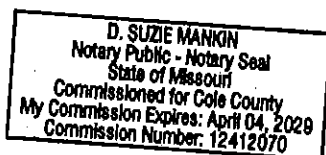
**COMES NOW JARROD J. ROBERTSON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

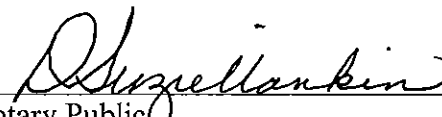
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JARROD J. ROBERTSON**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16<sup>th</sup> day of October 2025.



  
\_\_\_\_\_  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
Confluence Rivers Utility Operating ) Case No. WA-2026-0054  
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Charity PWS, and Rolling Hills PWS) )

**AFFIDAVIT OF ADAM STAMP**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

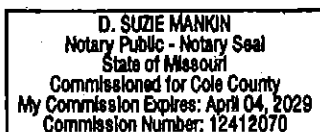
**COMES NOW ADAM STAMP** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

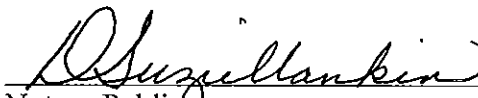
Further the Affiant sayeth not.

  
ADAM STAMP

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16th day of October 2025.



  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of the Application of )  
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Charity PWS, and Rolling Hills PWS) )

**AFFIDAVIT OF CHARLES TYRONE THOMASON**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

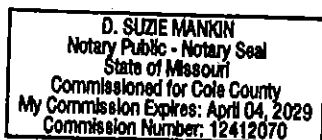
**COMES NOW CHARLES TYRONE THOMASON** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Charles Tyrone Thomason  
**CHARLES TYRONE THOMASON**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 16<sup>th</sup> day of October 2025.



D. Suzie Mankin  
Notary Public

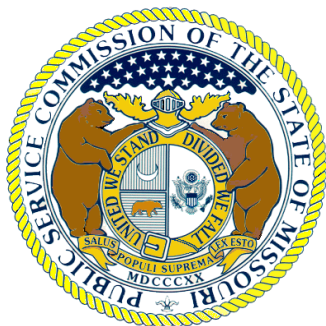


**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 10<sup>th</sup> day of November 2025.**



*Nancy Dippell*  
\_\_\_\_\_  
**Nancy Dippell**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**November 10, 2025**

**File/Case No. WA-2026-0054**

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**Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).**

**Sincerely,**



**Nancy Dippell  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.