

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, Assistant Vice President 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

THE PROPOSED SALE TRANSACTION

5. Confluence Rivers proposes to acquire all or substantially all of the sewer system assets of the Consolidated Public Water Supply District No. 1 of Knox County (“Knox County PWSD”), Missouri, a Missouri public water supply district duly incorporated and existing under Chapter 247, RSMo. Confluence Rivers seeks a Certificate of Convenience and Necessity (“CCN”) to operate the systems and provide service to the public.

6. Effective September 3, 2024, Central States Water Resources, Inc. (“CSWR”) entered into an *Agreement for Sale of Utility System* (“*Agreement*”) with Knox County PWSD. 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 4240-60.050(3)(A)12). CSWR proposes to purchase substantially all the sewer system assets of Knox County PWSD, as described in and under the terms and provisions of the *Agreement*.

7. 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.

8. On February 14, 2025, the Circuit Court of Knox County, Missouri, entered its Order Approving Sale of Sewer Facilities in Case No. 24KN-CC00062 (See Appendix C). Among other things, the Court found that the Agreement was “in the public interest and in the best interest of the [Knox County PWSD] and the residents and property owners connected to the Sewer Treatment Systems residing in Knox County, Missouri.”

CERTIFICATE OF CONVENIENCE AND NECESSITY

9. Knox County PWSD owns three wastewater systems totaling approximately 269 equivalent connections (based on permit applications) – the Baring system (150), Hurdland system (74) and Newark system (45). All three systems utilize lagoons and are located in Knox County between Confluence River’s existing Luray system to the North (25 miles) and its Lost Valley system to the South (35 miles).

10. There is no other same or similar sewer service available in the areas served by Knox County PWSD (i.e. no other sewer service within one (1) mile of the proposed service area). (20 CSR 4240-60.050(3)(A)8).

Baring System

11. The existing Baring wastewater treatment facility consists of a two-cell lagoon. The lagoon cells are not located adjacent to one another, and a pump station is used to convey effluent from the first cell to the second cell which is located a quarter mile north. The facility is regulated by the Missouri Department of Natural Resources under NPDES permit MO-0045811. (20 CSR 4240-60.050(3)(A)3).

12. As of April 2025, the Baring facility was in compliance based on EPA records. However, the lagoon is not equipped with any supplemental treatment to assist with meeting its stringent ammonia limits. While it is possible that the lagoon is in compliance based on its large treatment volume, operational monitoring will be required to determine if additional treatment is necessary. Additionally, the lagoon is not equipped with any disinfection, but the facility has E. Coli effluent limitations assigned to it.

13. After acquisition, Confluence Rivers plans to make operation or capital improvements to the Baring sewer system. (20 CSR 4240-60.050(3)(A)4). Attached hereto and marked as **Appendix D-C** is the Engineering Memorandum concerning the Baring system that provides a description of those improvements to the sewer system, including the reason for the improvements and estimated cost of capital improvements. **Appendix D-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.

Hurdland System

14. The Hurdland wastewater system utilizes a three-cell lagoon with a total combined potential treatment volume of approximately 3,500,000 Gal, however, sludge depths are currently unknown. Raw sewage is conveyed by force mains from three lift stations located throughout the collection system and eventually into an influent manhole at the southeast corner of cell 1. The facility is regulated by the Missouri Department of Natural Resources under NPDES permit MO-0115894. (20 CSR 4240-60.050(3)(A)3).

15. As of April 2025, raw sewage flows in the Hurdland service area fall within the design range, and EPA records show no exceedance over the past 12 quarters. However, based on

the stringent ammonia effluent limits, process upgrades will likely be necessary to consistently meet effluent limitations. Additionally, if average daily flow quantities increase above the design range, submitting an antidegradation review report to the Missouri Department of Natural Resources may be necessary.

16. After acquisition, Confluence Rivers plans to make operation or capital improvements to the Hurdland sewer system. (20 CSR 4240-60.050(3)(A)4). Attached hereto and marked as **Appendix E-C** is the Engineering Memorandum concerning the Hurdland System that provides a description of those improvements to the sewer system, including the reason for the improvements and estimated cost of capital improvements for completion of the improvements. **Appendix E-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.

Newark System

17. The Newark wastewater system utilizes a three-cell lagoon with a total combined surface area of approximately 42,400 square feet for secondary treatment. Raw sewage is conveyed by a force main into an influent manhole located within the drip field to the west of the first lagoon cell. The facility is regulated by the Missouri Department of Natural Resources under NPDES permit MO-0129976. (20 CSR 4240-60.050(3)(A)3).

18. As of April 2025, a review was performed of EPA's Echo compliance website which lists violations of wastewater treatment plants across the country. The Newark facility had not had any exceedances for pollutants within that past 12 quarters.

19. After acquisition, Confluence Rivers plans to make operation or capital improvements to the sewer system. (20 CSR 4240-60.050(3)(A)4). Attached hereto and marked

as **Appendix F-C** is the Engineering Memorandum concerning the Newark system that provides a description of those improvements to the sewer system, including the reason for the improvements and estimated cost of capital improvements for completion of the improvements. **Appendix F-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.

ADDITIONAL INFORMATION

20. Confluence Rivers requests permission, approval and a CCN to construct, install, own, operate, maintain, control and manage a sewer treatment system for the public in an area of Lafayette County, Missouri, as an addition to its existing service territories. Legal descriptions of the areas sought to be certificated are attached hereto as **Appendices G1, G2 and G3**. (20 CSR 4240-60.050(3)(A)1). Maps of the areas sought to be certificated are attached as **Appendices H1, H2 and H3**. (20 CSR 4240-60.050(3)(A)2).

21. There are no known direct communications with existing customers. However, the matter has been the subject of a Circuit Court proceeding. (See Appendix C) (20 CSR 4240-60.050(3)(A)5).

22. Within twenty (20) days after the filing of this Application, Confluence Rivers will provide notice to all potential customers within the designated service area. (20 CSR 4240-60.050(2)).

23. Attached hereto and marked as **Appendix I-C** is a feasibility study for the Knox County PWSD sewer systems for which Confluence Rivers seeks a CCN, with the proposed method for financing, proposed rates, service charges, and revenues and expenses during the first three years of operation by Confluence Rivers and includes an estimate of the costs to operate the

system. (20 CSR 4240-60.050(3)(A)6 and 20 CSR 4240-60.050(3)(A)9). **Appendix I-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 estimates that it will incur approximately \$1,100 to incorporate the Knox County PWSD sewer systems customers into Confluence Rivers. (20 CSR 4240-060.050(3)(A)9).

25. Confluence Rivers has requested the seller provide copies of any available support documentation related to the costs to operate the system. Confluence Rivers has not yet received such documents but will supplement its Application with whatever documents are received. (20 CSR 4240-60.050(3)(A)9).

26. Attached hereto and marked as **Appendix J-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 4240-60.050(3)(A)7). **Appendix J-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.

27. Confluence Rivers believes an acquisition premium does not exist and Confluence Rivers does not extend to seek recovery of such premium in future rates. (20 CSR 4240-60.050(3)(A)13).

28. Confluence Rivers has requested the seller provide financial statements, general ledgers, invoices, or billing registers for the Knox County PWSD sewer systems for the previous

five (5) years. Confluence Rivers has not yet received such documents but will supplement its Application with whatever documents are received. (20 CSR 4240-60.050(3)(A)10).

29. 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-K**. (20 CSR 4240-60.050(2)).

30. 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 4240-60.050(4)).

TARIFF/RATES

31. Confluence Rivers understands the existing customer rates for customers within the Knox County PWSD sewer systems to be \$35.00 per month, per connection. The Company proposes to charge the existing monthly fixed rate of \$35.00 for the customers in the Knox County PWSD sewer systems. In addition, the Company proposes to utilize Confluence Rivers' existing service charges for these systems, 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. 31, applicable to sewer service.

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

PUBLIC INTEREST

33. The grant of the requested CCN (and approval of the underlying transactions) is in the public interest and results in regulated sewer service being provided to the current and future residents of the Knox County PWSD sewer systems. 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 sewer system 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 any expenditures and investments required to maintain the systems.

MOTION FOR WAIVER

34. 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.

35. 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...”).

36. 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:

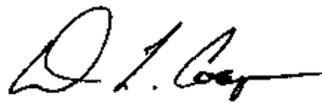
(A) Waiving the 60-day notice requirement of Rule 20 CSR 4240-4.017(1) for good cause shown;

(B) Granting Confluence Rivers a CCN authorizing it to install, acquire, build, construct, own, operate, control, manage, and maintain sewer treatment systems for the public within the specified areas currently served by Knox County PWSD;

(C) Authorizing Confluence Rivers to acquire the sewer system assets of Knox County PWSD, 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,



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

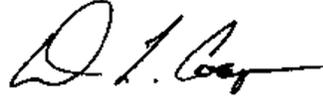
**ATTORNEYS FOR CONFLUENCE RIVERS
UTILITY OPERATING COMPANY, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail this 24th day of March 2026, to the following:

Staff Counsel Division
staffcounsel@psc.mo.gov

Office of the Public Counsel
opcservice@opc.mo.gov

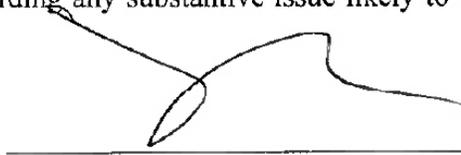


Dean L. Cooper

AFFIDAVIT

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

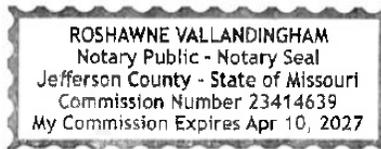
I, Josiah Cox, having been duly sworn upon my oath, state that I am the President of Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers"), that I am duly authorized to make this affidavit on behalf of Confluence Rivers, that I have knowledge of the matters stated herein, and that said 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 27th day of February, 2026.


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 27th day of February, 2026.



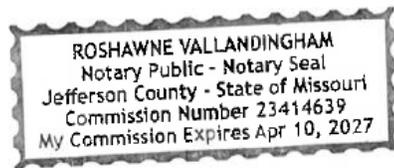
Josiah Cox, President
CONFLUENCE RIVERS UTILITY OPERATING
COMPANY, INC. and CENTRAL STATES
WATER RESOURCES, INC.

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

Subscribed and sworn before me this 27th day of February, 2026.


Notary Public

My Commission Expires 04-10-2027



APPENDIX C

HAS BEEN
FILED SEPARATELY

APPENDIX D-C

**HAS BEEN
IDENTIFIED AS**

CONFIDENTIAL

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

APPENDIX E-C

**HAS BEEN
IDENTIFIED AS**

CONFIDENTIAL

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

APPENDIX F-C

**HAS BEEN
IDENTIFIED AS**

CONFIDENTIAL

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

APPENDICES G1, G2, and G3

HAVE BEEN
FILED SEPARATELY

APPENDICES H1, H2, and H3

HAVE BEEN
FILED SEPARATELY

APPENDIX I-C

**HAS BEEN
IDENTIFIED AS**

CONFIDENTIAL

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

APPENDIX J-C

HAS BEEN
IDENTIFIED AS

CONFIDENTIAL

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

APPENDIX K

HAS BEEN
FILED SEPARATELY