

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

In the matter of the Application of)	
Ozark Shores Water Company, North)	
Suburban Public Utility Company)	
and Camden County Public Water)	
Supply District Number Four for)	
an order authorizing the Sale,)	File No.WM-2015-0231
Transfer and Assignment of Water)	
Assets to Camden County Public Water)	
Supply District Number Four and in)	
connection therewith certain other)	
related transactions.)	

MOTION FOR RECONSIDERATION OF ORDER
APPROVING EXTENSION OF TIME

Comes now Camden County Public Water Supply District Number Four (the “District”) with the concurrence of Ozark Shores Water Company (“Ozark Shores”) and North Suburban Public Utility Company (“North Suburban”) (sometimes collectively referred to as “Applicants”) and for its above entitled motion submits the following to the Commission:

1. On April 29, 2015 the Staff filed its Status Report And Motion For Extension Of Time To File Staff Recommendation. As support for its request, Staff advised that it needed “additional time, 30 days, [to June 4, 2015] in which to file its recommendation to permit *final calculation and correction to company plant records, review depreciation reserve and rate base items.*” [emphasis added]

2. On the same day, the Commission entered its Order Extending Time For Recommendation in which it granted Staff’s motion. The District respectfully requests the Commission to reconsider the extension order.

3. The District understands and respects the Commission’s need for certain policies and procedures. However, any corrections to Ozark Shores’ plant records, depreciation reserve

and rate base items are meaningless to the proposed transaction due to the District's status as a political subdivision. As a political subdivision, the District's rates contain no component for investor return on rate base. The Staff has asked for time to complete steps that are of no use in evaluating the District's proposed transaction with Ozark Shores and North Suburban.

4. Delay in reviewing and approving the application may detrimentally affect the District's customers. Indeed, the District's primary concern is that a delay in the transaction could push the issuance of the bonds necessary to consummate the transaction into a higher interest rate environment which would have a direct impact upon the future rates charged to both the District's current customers and its proposed customers.

WHEREFORE, Camden County Public Water Supply District Number Four respectfully requests the Commission to reconsider its Order Extending Time For Recommendation and set it aside reinstituting the earlier deadline for the Staff recommendation; or alternatively, enter an order reducing the length of the extension to be no more than fifteen (15) days.

Respectfully submitted

/s/ Robert W. Pohl

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ATTORNEYS FOR OZARK SHORES WATER COMPANY
AND NORTH SUBURBAN PUBLIC UTILITY COMPANY

TOGETHER, THE JOINT APPLICANTS

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 30th day of April, 2015, to General Counsel's Office at staffcounsellservice@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

s/ Robert W. Pohl