

**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)	File No. WM-2015-0231
Number Four for an Order)	
Authorizing the Sale, Transfer)	
and Assignment Water Assets to)	
Camden County Public Water)	
Supply District Number Four)	
and in Connection therewith Certain)	
Other Related Transactions.)	

**MISSOURI ATTORNEY GENERAL’S
REPLY IN SUPPORT OF HIS
APPLICATION TO INTERVENE OUT OF TIME**

The Missouri Attorney General’s Office seeks to intervene in this matter to aid in the consideration of the ultimate issue before Commission: whether the proposed transaction between Ozark Shores and the Public Water Supply District is to the benefit or the detriment of the public. The Attorney General is not asking the Commission grant any extra-judicial injunctive relief or exercise any power beyond the four corners of the present action—whether to approve this transaction. As such, granting the Attorney General leave to intervene is purely within the discretion of the Commission. If the Commission believes that the Attorney General’s participation will aid in ascertaining the balance of interests surrounding this sale, the Commission should grant this motion to intervene.

I. *Granting this Request will not Cause any Hardship to the Parties*

As an initial matter, Ozark Shores does not identify any specific hardship that it or its business partners will face by having the Attorney General intervene and participate in this hearing. That is because the Attorney General's participation does not demand any meaningful amount of additional resources or time. The only existing concern that Ozark Shores has identified has been to expedite this matter, due to a potential rise in bond rates. However, even this general concern is not implicated by the proposed intervention. The Attorney General does not ask that the Commission reset its existing schedule, defer pending deadlines, or grant additional burdensome discovery orders as part of his prayer for intervention. In no uncertain terms, the Attorney General assures the Commission that he is prepared to participate within all existing time restrictions.

II. *Granting this Request will likely Aid in Resolving the Pending Issues in a More Timely Manner.*

If anything, the Attorney General's participation may aid the Commission in resolving the outstanding issues identified in the Staff's Recommendation against Approval in a more prompt and timely manner. In that filing, the Staff explained that Ozark Shores had been unable to adequately demonstrate the proposed transaction was free of conflicts of interest within the compressed time frame of this expedited consideration. The Attorney

General may aid in overcoming this bottleneck, by bringing to bear additional resources to help expedite these pending concerns raised by the staff. As stated in his initial filing, the Attorney General is charged with the responsibility to police governmental office holders, and thus may bring this expertise to bring this matter to a close in a more orderly manner.

Already, the Attorney General has engaged with all interested parties to this case. Although discussions are ongoing, the Attorney General believes that he may be able to secure assurances from the parties to the transaction sufficient to resolve, or at the very least adequately explore the essential concerns related to the proposed transaction. There is no reason for the Commission to cut this burgeoning assistance off prematurely.

The Commission should grant the Attorney General's Motion to Intervene Out of Time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the preceding motion was served electronically to all counsel of record this 20th Day of May 2015.

/s/ *Brian T. Bear*
Brian T. Bear