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

)

)

In the Matter of the Application of Confluence Rivers Utility Operating Company, Inc., for Authority to Issue Long-Term Debt and to Secure Same with a Lien on its Property

File No. WF-2023-0023

## **RESPONSE TO STAFF RECOMMENDATION**

**COMES NOW** Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers"), and for its *Response to Staff Recommendation* states as follows to the Missouri Public Service Commission ("Commission"):

1. On August 1, 2022, Confluence Rivers submitted applications requesting authority to issue long-term debt to CoBank, ACB ("CoBank") in an amount not to exceed \$7.2 million. Confluence Rivers also seeks authority to secure this long-term indebtedness by granting CoBank a lien on all equity Confluence owns now and will own in the future.

2. On October 7, 2022, the Staff of the Commission ("Staff") filed its *Staff Recommendation* and supporting *Memorandum* recommending approval of Confluence Rivers' *Application*, subject to the conditions described in Staff's *Memorandum*.

3. Confluence Rivers has reviewed the eight (8) proposed conditions listed on pages 6-7 of Staff's *Memorandum* and states that it has no objection to the proposed conditions.

**WHEREFORE**, Confluence Rivers requests the Commission issue an order approving Confluence Rivers' *Application*, subject to the conditions found in Staff's *Memorandum*, and for

1

such other and further relief as deemed appropriate in the circumstances.

Respectfully submitted,

21. Com-

Dean L. Cooper, Mo. Bar #36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102-0456 Telephone: (573) 635-7166 Facsimile: (573) 635-0427 dcooper@brydonlaw.com

David L. Woodsmall MBE #40747 Central States Water Resources 1630 Des Peres Rd., Suite 140 Des Peres, MO 63131 dwoodsmall@cswrgroup.com

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

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 17<sup>th</sup> day of October 2022 to all counsel of record.

Q1.Com