

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

The Staff of the Missouri	)	
Public Service Commission,	)	
	)	
Complainant,	)	
v.	)	<u>Case No. WC-2007-0452</u>
	)	<u>and WO-2007-0444</u>
Suburban Water and Sewer Co. and Gordon	)	
Burnam,	)	
	)	
Respondents.	)	

**MOTION FOR ORDER DIRECTING STAFF  
TO INVESTIGATE AND FILE A REPORT**

COMES NOW, the Staff of the Public Service Commission, by counsel, and moves the Commission for an order directing Staff to investigate the facilities at Suburban Water and Sewer Co. to determine compliance with the Commission's Order in Case No. WR-2005-0455, and Suburban's ability to provide safe and adequate service. Staff states:

1. The Commission has authority to investigate any violation of its rules and orders and direct the General Counsel's Office to seek injunctive relief under Section 386.360.
2. The Commission has authority under 393.140 to investigate and ascertain the quality of water supplied and investigate the methods employed to supply and distribute water. Under 393.140(3) the Commission has the power to examine and investigate the plants and methods employed in delivering and supplying water, and shall have access to make such examination and investigation to all parts of the plant owned, used or operated for the supplying and distribution of water. Further, 393. 140 provides that the Commission has authority to order

reasonable improvements to best promote the public interest, preserve the public health, and protect those using such water.

3. Every water corporation shall furnish and provide such service instrumentalities and facilities as shall be safe and adequate. Section 393.130.
4. The Commission should order the Staff to investigate and report Suburban's compliance with the Commission Order in Case No. WR-2005-0455; in particular, the Staff should investigate Suburban's compliance with the following directives from the Commission:
  - a) Install meters to all buildings;
  - b) Implement a ten year replacement program for existing meters;
  - c) Install flush valves with the flushing capability of at least 3 feet per second in all mains;
  - d) Replace the standpipe inlet high enough to provide adequate circulation and detention time; and
  - e) Contract with a certified operator to maintain the company's well and distribution system.
5. Further, the order should direct Staff to investigate and make recommendations in a written report regarding improvements necessary for Suburban to provide safe and adequate service to its customers. The following improvements to the system should be considered:
  - a) Installing meters to each and every building;

- b) Replacing meters that are more than ten years old in compliance with Suburban's commitment to implement a replacement program and 4 CSR 240-10.030(37) and (38). Some meters may be 35 years old;
  - c) Installing flush valves with the flushing capability of at least 3 feet per second in all mains;
  - d) Contracting with a certified operator to maintain the company's well and distribution system;
  - e) Installing a pressure reducing valve in the connection with PWSD #1;
  - f) Replace, rather than repair, the standpipe; and
  - g) Cap the well if water is taken from PWSD #1;
6. Staff's report regarding compliance with the Commission's Order in WR-2005-0455 should be filed by July 20, 2007; Staff's recommendations for future improvements should be filed by July 20, 2007, or the Commission should consider bifurcating these issues from the Complaint case and set a separate hearing.
7. Staff requests that the order direct Suburban and Gordon Burnam to cooperate with Staff's investigation and allow access to the plant and facilities under Section 393.140(3).

**Wherefore**, the Staff moves the Commission for an order directing Staff to investigate and file a report.

Respectfully submitted,

/s/ Steven C. Reed

Steven C. Reed  
Litigation Counsel  
Missouri Bar No. 40616

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-3015 (Telephone)  
(573) 751-9285 (Fax)  
[steven.reed@psc.mo.gov](mailto:steven.reed@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record on this 10th day of July, 2007.

/s/ Steven C. Reed

Steven C. Reed