

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water)
Company for Certificates of Convenience)
and Necessity Authorizing it to Install, Own,) **File No. SA-2021-0074**
Acquire, Construct, Operate, Control,)
Manage and Maintain Sewer Systems in)
and around the City of Trimble, Missouri)

ORDER DIRECTING NOTICE, SETTING DATE FOR INTERVENTION, AND ORDERING STAFF RECOMMENDATION

Issue Date: September 18, 2020

Effective Date: September 18, 2020

On September 17, 2020, Missouri-American Water Company (Company) filed its application for a certificate of convenience and necessity (CCN) and waiver. The Company has applied for a CNN authorizing it to install, own, acquire, construct, operate, control, manage, and maintain sewer systems in and around the City of Trimble, Missouri. The Company has also requested a waiver of the 60-day notice requirements of 20 CSR 4240-4.017.

The Commission will issue notice, set a deadline for intervention requests, and direct the filing of a recommendation by the Staff of the Commission.

THE COMMISSION ORDERS THAT:

1. The Commission's Public Policy and Outreach Department shall send notice of this application to the members of the media and the General Assembly representing Clinton County, Missouri.
2. The Commission's Data Center shall provide a copy of this order to the county commission of Clinton County and to the Missouri Department of Natural Resources.

3. Any request to intervene shall be filed with the Commission no later than October 3, 2020. Such applications shall be filed with:

Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Or with the Commission's electronic filing and information service.

4. The Staff of the Missouri Public Service Commission shall file its recommendation no later than November 2, 2020.

5. This Order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in dark ink, reading "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Paul T. Graham, Regulatory Law Judge,
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 18th day of September, 2020.

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

In the Matter of Missouri-American)
Water Company for Certificates of)
Convenience and Necessity Authorizing)
it to Install, Own, Acquire, Construct,)
Operate, Control, Manage and Maintain)
Sewer Systems in and around the City of)
Trimble, Missouri.)

File No. SA-2021-_____

**APPLICATION AND
MOTION FOR WAIVER**

COMES NOW Missouri-American Water Company (“MAWC”) pursuant to Sections 393.140, and 393.170 RSMo, and 20 CSR 4240-2.060, 20 CSR 4240-3.305, and 20 CSR 4240-4.017(1)(D), and for its Application and Motion for Waiver, states as follows to the Missouri Public Service Commission:

BACKGROUND INFORMATION

1. This Application is being filed by MAWC to obtain certificates of convenience and necessity to install, own, acquire, construct, operate, control, manage and maintain sewer systems in and around the City of Trimble, Missouri.

2. MAWC is a Missouri corporation, active and in good standing with the Missouri Secretary of State, with its principal office and place of business at 727 Craig Road, St. Louis, Missouri 63141. Pursuant to Commission regulation 20 CSR 4240-2.060(1)(G), MAWC incorporates by reference the certified copies of its articles of incorporation and its certificate of good standing previously filed in File No. WO-2020-0190.

3. MAWC currently provides water service to the public in and around the cities of St. Joseph, Joplin, Brunswick, Mexico, Warrensburg, Parkville, Riverside, Jefferson City, and parts of Cole, St. Charles, Warren, Jefferson, Morgan, Pettis, Benton, Barry, Stone, Greene,

Taney, Christian, Clay, Ray, and Platte Counties, and most all of St. Louis County, Missouri. MAWC currently provides water service to approximately 470,000 customers. MAWC provides sewer service to approximately 15,000 customers in Callaway, Jefferson, Pettis, Cole, Morgan, Platte, Taney, Stone, Christian, St. Louis, Clinton, Clay, Ray, and Warren Counties, Missouri. MAWC is a “water corporation,” a “sewer corporation” and a “public utility” as those terms are defined in Section 386.020 and is subject to the jurisdiction and supervision of the Commission as provided by law. MAWC has no overdue Commission annual reports or assessment fees. There is no pending action or final unsatisfied judgment or decision against MAWC from any state or federal agency or court which involves customer service or rates, which action, judgement or decision has occurred within three years of the date of this Application, other than any cases pending before this Commission.

4. Communications respecting this Application should be addressed to the undersigned counsel and:

Missouri-American Water Company:

Ms. Nikki Pacific

Manager Business Development – Proposal and Integration

Missouri-American Water Company

727 Craig Road

Creve Coeur, Missouri 63021

Direct Dial 314-996-2215

Nikki.pacific@amwater.com

CERTIFICATES OF CONVENIENCE AND NECESSITY (CCN)

5. MAWC proposes to purchase substantially all of the sewer assets of the currently unregulated system of the City of Trimble, Missouri (“Trimble”), and requests permission, approval and a CCN to own, acquire, construct, operate, control, manage and maintain the sewer system for the public in an area in and around the City of Trimble, Missouri. MAWC also

proposes to purchase substantially all of the sewer assets of the currently unregulated system of Centennial Acres Association, Inc. (“Centennial Acres”), and requests permission, approval and a CCN to own, acquire, construct, operate, control, manage and maintain the sewer system for the public in or near Trimble, Missouri.

Trimble Transaction

6. To provide service to the proposed area, MAWC will purchase the sewer system and lagoon treatment plant from Trimble. Trimble is a Fourth-Class City located in Clinton County. Trimble serves about 280 sewer accounts which are primarily residential customers with a small number of commercial and industrial customers.

7. The Trimble sewer system consists of approximately 24,200 linear feet of sewer line, five pumping stations and a three-cell treatment lagoon.

8. On January 26, 2020, the Trimble Board of Aldermen passed Ordinance No. 20-293, *An Ordinance Calling For An Election In The City Of Trimble, Missouri To Be Held On April 7, 2020 For the Purpose Of Submitting To The Qualified Voters Of The City A Proposition To Sell Certain Assets Associated With The City’s Wastewater System To Missouri American Water (“Ordinance”)*. A copy of the *Ordinance* is attached hereto as **Appendix A**. Section 2 of the *Ordinance* provided notice of an election to be held on April 7, 2020, to vote on whether the wastewater utility owned by Trimble should be sold. Section 3 provided:

If a majority of the votes cast on the proposal by the qualified voters voting thereon are in favor of the proposal, then the sale contemplated in this section shall be affected. If a majority of the votes cast by the qualified voters voting are opposed to the proposal, then City of Trimble's Board of Aldermen shall not proceed forward with the sale contemplated in this section unless and until the Board of Aldermen resubmits a proposal to authorize the Board of Aldermen to proceed forward with a sale authorized by this section and such proposal is approved by a majority of the qualified voters voting thereon.

9. There was a public meeting held in Trimble on March 17, 2020 and there was a virtual public meeting held on May 27, 2020 to discuss the proposed sale. MAWC representatives attended these public meetings and were available to answer any questions.

10. Due to the novel coronavirus, the April 7, 2020 election was postponed and held on June 2, 2020, with a majority of votes cast in favor of the sale of the Trimble wastewater system to Missouri-American Water Company.

11. On July 10, 2020, MAWC entered into a *Purchase Agreement* with Trimble. A copy of the *Purchase Agreement* is attached as **Appendix B-C**. Appendix B-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.

12. MAWC proposes to purchase all the sewer utility assets of Trimble, as specifically described in, and under the terms and provisions of the *Purchase Agreement*. A legal description of the area sought to be certificated is attached hereto as **Appendix C**. A map of the area sought to be certificate is attached to this Application as **Appendix D**. MAWC proposes that the area to be certificated for sewer service be described as: “The City of Trimble and the surrounding area.”

13. Attached hereto and marked as **Appendix E-C** is a list of ten residents or landowners within the proposed service area. **Appendix E-C** has been identified as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)(1), as it contains customer-specific information.

Centennial Acres Transaction

14. To provide service to the proposed area, MAWC will purchase the sewer system from Centennial Acres. Centennial Acres is a residential development of single family lots located near Trimble, Missouri. The sewer system serves approximately 13 homes and has the ability to serve additional undeveloped lots.

15. On August 19, 2020, MAWC entered into an *Agreement For Purchase of Wastewater System* (“*Agreement for Purchase*”) with Centennial Acres. A copy of the *Agreement for Purchase* is attached as **Appendix F-C**. **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.

16. MAWC proposes to purchase all the sewer system assets of Centennial Acres, as specifically described in, and under the terms and provisions of the *Agreement for Purchase*. A legal description of the area sought to be certificated is attached hereto as **Appendix G**. A map of the area sought to be certificated is attached to this Application as **Appendix H**. MAWC proposes that the area to be certificated for sewer service be described as “Centennial Acres.”

17. Attached hereto and marked as **Appendix I-C** is a list of ten residents or landowners within the proposed service area. **Appendix I-C** has been identified as Confidential in accordance with Commission Rule 20 CSR 4240-2.135(2)(A)(1), as it contains customer-specific information.

ADDITIONAL INFORMATION

18. Attached hereto and marked as **Appendix J-C** is a feasibility study for the Trimble sewer system for which MAWC seeks a CCN, containing plans and specifications for

the utility system and estimated cost of the construction of the utility system during the first three (3) years of ownership; proposed rates and charges; and estimates of the number of customers and estimated expenses and revenues during the first three years of operation by MAWC. No external financing is anticipated. **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.

19. MAWC will receive a franchise from Trimble as called for by the *Purchase Agreement*.

20. Attached hereto and marked as **Appendix K-C** is a feasibility study for the Centennial Acres sewer system for which MAWC seeks a CCN, containing plans and specifications for the utility system and estimated cost of the construction of the utility system during the first three (3) years of ownership; proposed rates and charges; and estimates of the number of customers and estimated expenses and revenues during the first three years of operation by MAWC. No external financing is anticipated. **Appendix K-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.

TARIFFS/RATES

21. MAWC proposes to provide service to the Trimble system pursuant to the existing rates currently applicable to MAWC's Pettis County, Fenton, Hickory Hills, Temple Terrace, Anna Meadows, Jaxson Estates, Timber Springs and Clinton Estates and to utilize the rules and regulations governing sewer service currently found in MAWC's sewer tariff P.S.C. MO No. 26, until such time as the rates and rules are modified according to law.

22. For the Centennial Acres system, MAWC proposes to provide service using the \$75.00 per month rate approved by the Homeowners' Association and to utilize the rules and regulations governing sewer service currently found in MAWC's sewer tariff P.S.C. MO No. 26, until such time as the rates and rules are modified according to law.

PUBLIC INTEREST

23. The grant of the requested CCNs (and approval of the underlying transactions) is in the public interest and will result in the provision of regulated sewer service to the current and future residents of the service area. The sewer assets of Trimble and Centennial Acres would be acquired by MAWC, a Missouri public utility, and be subject to the jurisdiction of the Commission. MAWC has considerable expertise and experience in providing sewer utility services to residents of the State of Missouri and is fully qualified, in all respects, to own and operate the sewer systems currently being operated in and around the City of Trimble.

MOTION FOR WAIVER

24. Commission Rule 20 CSR 4240-4.017(1) provides that "(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." A notice was not filed 60 days prior to the filing of this Application. As such, and to the extent required, MAWC seeks a waiver of the 60-day notice requirement.

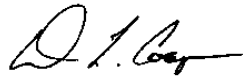
25. Rule 20 CSR 4240-4.017(1)(D) provides that a waiver may be granted for good cause. In this regard, MAWC declares (as verified below) that it has had no communication with the Office of the Commission (as defined by Commission Rule 20 CSR 4240-4.015(10)) within the prior 150 days regarding any substantive issue likely to be in this case, other than those pleadings filed for record. Accordingly, for good cause shown, MAWC moves for a waiver of

the 60-day notice requirement of Rule 20 CSR 4240-4.017(1) and acceptance of this Application at this time.

WHEREFORE, MAWC requests the Commission issue an order:

1. Granting MAWC permission, approval, and Certificates of Convenience and Necessity authorizing MAWC to install, acquire, build, construct, own, operate, control, manage and maintain a sewer system for the public within the areas referred to above;
2. Granting MAWC permission to acquire the sewer assets identified herein of the City of Trimble, Missouri and Centennial Acres Association, Inc.; and
3. Authorizing MAWC to take such actions as may be deemed necessary and appropriate to accomplish the purposes of the Application, the Trimble *Purchase Agreement* and the Centennial Acres *Agreement for Purchase*, and to consummate related transactions in accordance with each of the agreements.

Respectfully submitted,



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

Timothy W. Luft, Mo. Bar #40506
Corporate Counsel
MISSOURI-AMERICAN WATER COMPANY
727 Craig Road
St. Louis, MO 63141
(314) 996-2279 telephone
(314) 997-2451 facsimile
timothy.luft@amwater.com

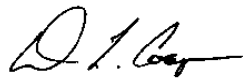
**ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 17th day of September 2020, to:

General Counsel's Office
staffcounsel@psc.mo.gov

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



Dean L. Cooper

VERIFICATION

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

I, Timothy W. Luft, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am Vice-President - Legal of Missouri-American Water Company, that I am duly authorized to make this affidavit on behalf of MAWC, that I have knowledge of the matters stated herein, and that said matters are true and correct to the best of my knowledge and belief. Additionally, no representative of MAWC 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 immediately preceding 150 days regarding the subject matter of this Application.



BILL NO. 302

ORDINANCE NO. 20-293

AN ORDINANCE CALLING FOR AN ELECTION IN THE CITY OF TRIMBLE, MISSOURI TO BE HELD ON APRIL 7, 2020 FOR THE PURPOSE OF SUBMITTING TO THE QUALIFIED VOTERS OF THE CITY A PROPOSITION TO SELL CERTAIN ASSETS ASSOCIATED WITH THE CITY'S WASTE WATER SYSTEM TO MISSOURI AMERICAN WATER COMPANY FOR THEIR APPROVAL PURSUANT TO THE AUTHORITY GRANTED BY AND SUBJECT TO THE PROVISIONS OF REVISED MISSOURI STATUTE SECTION 393.320.

WHEREAS, Section 393.320 of the Revised Statutes of Missouri sets forth a procedure for small wastewater utilities to sell its public wastewater (sewer) utility assets which may be owned by the city; and

WHEREAS, Section 393.320 of the Revised Statutes of Missouri provides that before any city of the shall sell any public utility which may be owned by it, the city shall first submit the proposition for such sale, by ordinance, to the voters of said city; and

WHEREAS, the sale of the wastewater (sewer) utility is expected to benefit the City of Trimble by eliminating environmental liability and obligations, among other reasons; and

WHEREAS, the Board of Aldermen believes it is in the best interests of the City of Trimble and its residents to take all steps necessary to authorize and complete the sale of the City's wastewater (sewer) utility, if approved by the qualified voters;

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF ALDERMEN OF THE CITY OF TRIMBLE, MISSOURI, AS FOLLOWS:

SECTION 1. At the regular election to be held on April 7, 2020, the following question shall be submitted to the qualified voters of the City of Trimble, Missouri, for their approval. The ballot will read:

Sale of the Trimble Wastewater (sewer) Utilities

Shall the City of Trimble, Missouri, be authorized to sell its wastewater (sewer) utility to Missouri American Water Company for the sum of \$1,000,000.00 (One Million Dollars)?

Yes ☐
No ☐

INSTRUCTION TO VOTERS

If you are in favor of the proposition, darken in the oval next to the word "YES".
If you are opposed to the proposition, darken in the oval next to the word "NO".

SECTION 2. At the regular election to be held on April 7, 2020, the proposition as set forth in Section 1 hereof shall be submitted to the qualified voters of the City of Trimble, Missouri, for their approval. The ballot will read identical to the ballot language set forth in Section 1 hereof.

SECTION 3. If a majority of the votes cast on the question by the qualified voters voting thereon are in favor of the question, then the City Clerk upon receipt of the election certificate from the Election Authority shall certify the results of such election to the Secretary of State of the State of Missouri.

SECTION 4. If a majority of the votes cast on the question by the qualified voters voting thereon are in favor of the question, then the City shall negotiate a contract with Missouri American Water Company for a price of not less than \$1,000,000.00 (one million dollars) on a cash-free, debt-free basis, including terms that provide for future service, maintenance, capital improvements of at least \$1,000,000.00 (one million dollars) over the course of five years, and other terms and conditions. Failure to successfully negotiate a contract for sale shall render this ordinance and the election held pursuant to this ordinance null and void.

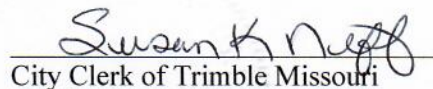
SECTION 5. The City Clerk is directed to notify the County Clerk of Clinton County, Missouri, of the adoption of this Ordinance no later than 5:00 P.M. on January 28, 2020, and to include in the notification all of the terms and provisions required by the Comprehensive Election Act, Chapter 115 of the Revised Statutes of Missouri, as amended, and do all things called for by law in connection with the holding of said election.

SECTION 6. This Ordinance shall be in full force and effect from and after its passage and approval by the Mayor and Board of Aldermen.

READ TWO TIMES, PASSED AND APPROVED THIS 26 DAY OF January 2020.


Mayor Lizar

ATTEST:


City Clerk of Trimble Missouri

1st reading: 4 yes
2nd reading: 4 yes

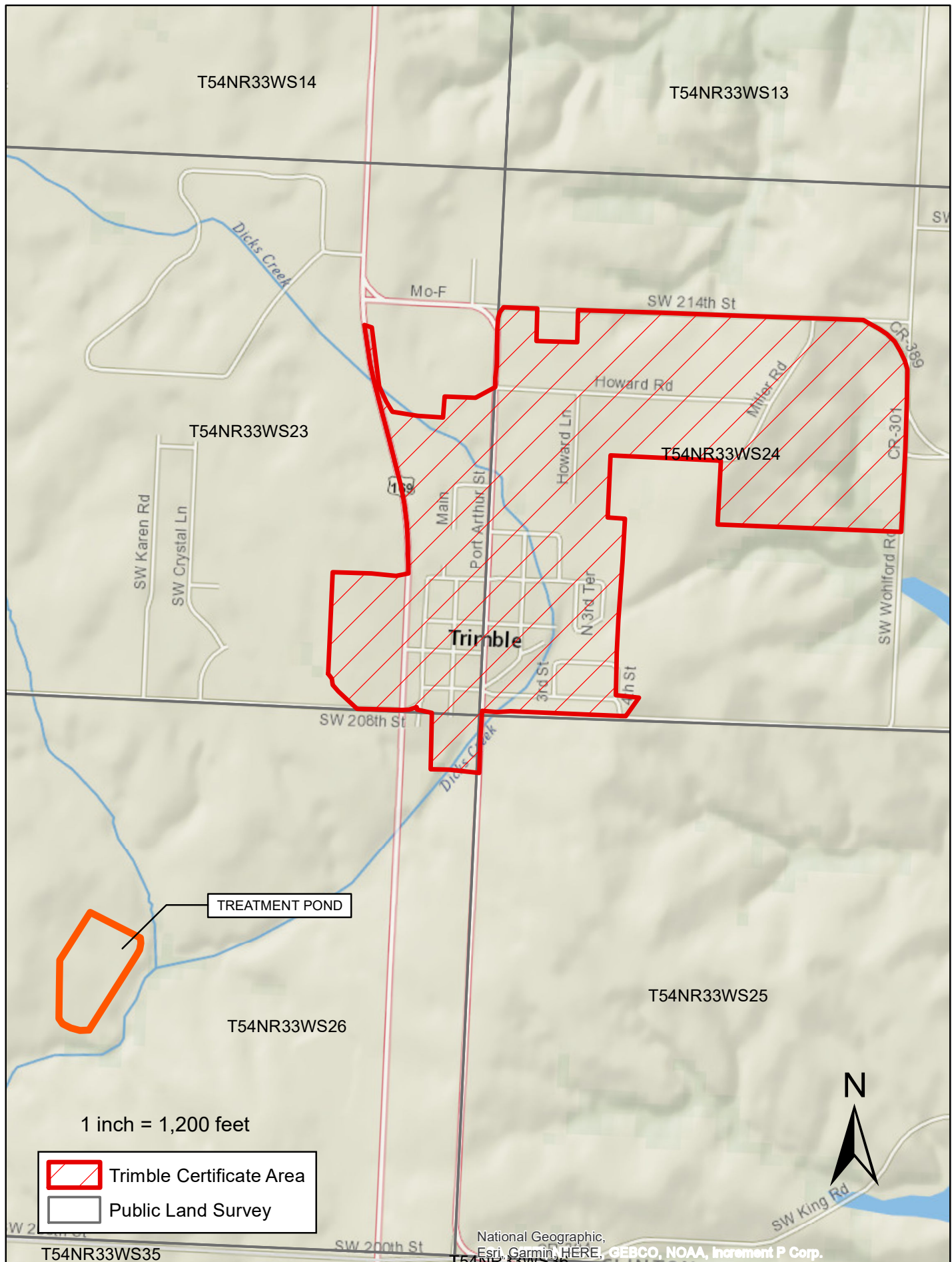
**APPENDIX B-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)3. and 6.

Legal Description

A tract of land in part of Sections 23, 24, 25 and 26, Township 54 North, Range 33 West, City of Trimble, Clinton County, Missouri and being more particularly described as follows:

Beginning at the intersection of the centerline of highway 169 and Southwest 214Th Street; thence East along the centerline of Southwest 214Th Street to its intersection with the Northerly prolongation of the centerline of Southwest Wohlford Road, (Route 301); thence South along the centerline of said Wohlford Road, (Route 301), to its intersection with the easterly prolongation of the South line of Lot G of the Replat of Lots 11 thru 14 of Block C of Cape Cod Estates, according to the plat thereof recorded in Plat Book PCA, PG 665 of the Clinton County, Missouri Records; thence West along said South line and continuing its prolongation thereof to its intersection with the northwardly prolongation of the East line of South 4Th street, being also the Northwest corner of a tract of land now or formerly owned by Chrisman Lowman and Rebecca Lowman husband and wife; thence South along the West line of said Lowman tract to the most Southwestern corner thereof; thence East and along said Lowman tract property line and thence South continuing with said Lowman tract property line to a point being its most Southern corner and the North line of Southwest 208Th Street; thence continuing to the South line of said 208Th Street; thence East to the Northeast corner of a tract of land now or formerly owned by Trimble Baptist Church; thence South along the East line of said Church tract to the Southeast corner thereof; thence West along the South line of said Church tract and its prolongation thereof to its intersection with the Northerly prolongation thereof of a North and South line marking the boundary of the Trimble City limits; thence South along said City limits boundary to the intersection of the Easterly prolongation thereof of the South line of a tract of land now or formerly owned by James Fansher and Nancey Fansher, his wife; thence continuing West along the South line of said Fansher tract to the Southwest corner thereof and thence continuing a westerly prolongation thereof and intersecting with the West line of Highway 169; thence South along said West line to its intersection with the North line of Southwest 200Th Street; thence West along said North line to the Southwest corner of a tract of land now or formerly owned by Hasler Land & Cattle Co., LLC; thence North from said property corner and along the property line of said Hasler Land & Cattle Co., LLC., to the Northeast corner of a tract of land now or formerly owned by Dwain Pigg and Dorothy Pigg, his wife; thence West, along the North line of said Pigg tract to the Northwest corner thereof; thence North to the South line of Southwest 208Th Street; thence East, along said South line to the intersection of the Southwardly prolongation of the West line of a tract of land now or formerly owned by Timber & Treats Inc.; thence North, along said Timber & Treats property to the Northwest corner thereof; thence East along the North line of said Timber & Treats Inc. tract and its Easterly prolongation thereof to its intersection with the West line of Highway 169; thence Northwardly along said West line to the Point of Beginning.



**APPENDIX E-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)1.

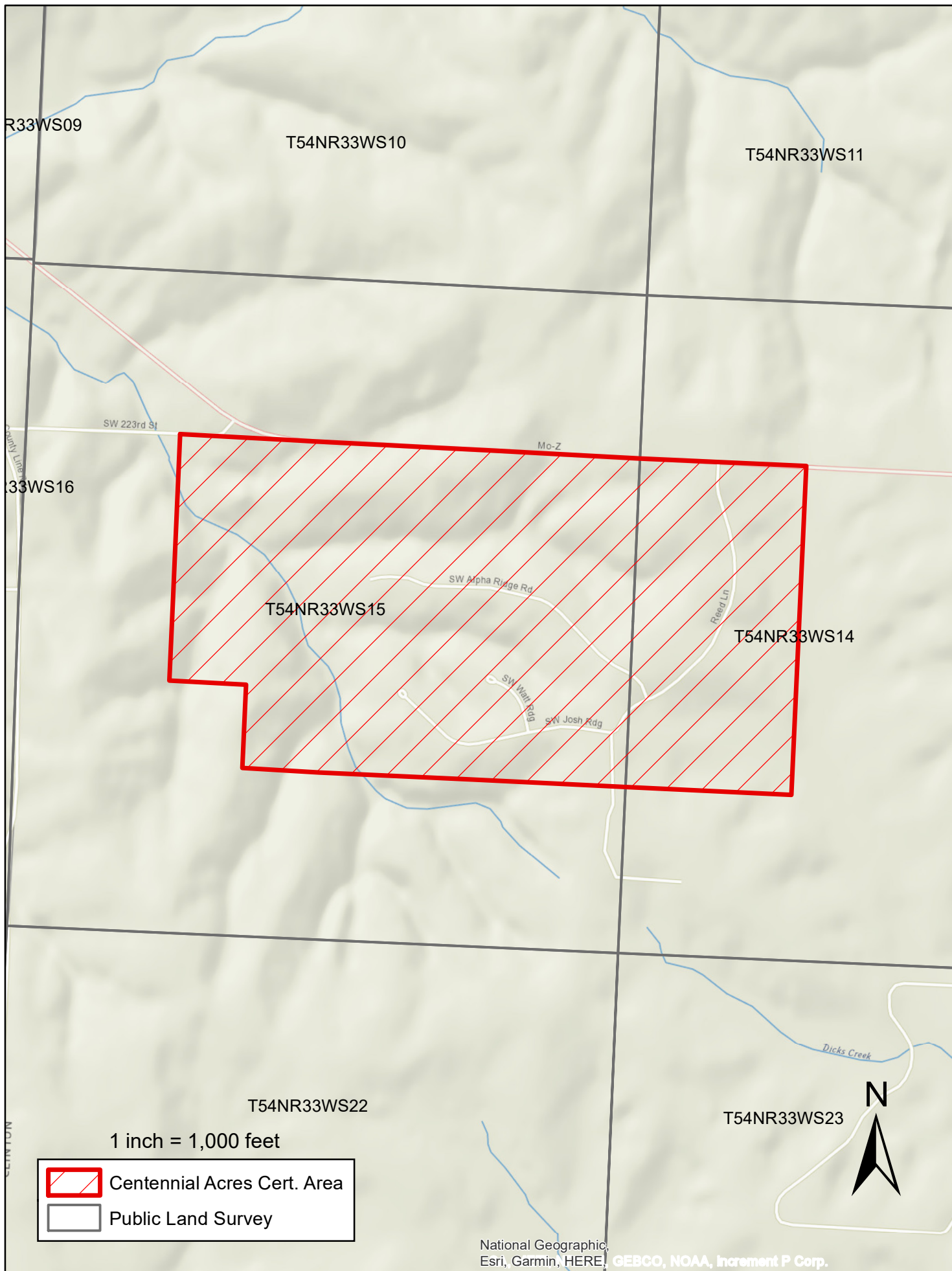
**APPENDIX F-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)3. and 6.

Legal Description

A tract of land in part of Sections 14 and 15, Township 54 North, Range 33 West, City of Trimble, Clinton County, Missouri and being more particularly described as follows:

Beginning at the Northeast corner of the Southwest Quarter of the Northwest Quarter of Section 14, Township 54 North, Range 33 West; thence South along the East line of said Quarter-Quarter Section and its southerly prolongation to the Southeast corner of the Northwest Quarter of the Southwest Quarter of said Section 14; thence West along the South line of said Quarter-Quarter Section to the Southwest corner thereof, being also the Southeast corner of the Northeast Quarter of the Southeast Quarter of Section 15, Township 54 North, Range 33 West; thence continuing west along the South line of said Quarter-Quarter Section and its westerly prolongation to the Southwest corner of the Northwest Quarter of the Southeast Quarter of said Section 15; thence North along the West line of said Quarter-Quarter Section to the Southeast corner of the North 660 feet of the Northeast Quarter of the Southwest Quarter of said Section 15; thence West along the South line of said North 660 feet, 660 feet; thence north to a point in the North line of the Southeast Quarter of the Northwest Quarter of the said Section 15; thence East along said North line to the Northeast corner thereof, being also the Northwest corner of the Southwest Quarter of the Northeast Quarter of said Section 15; thence continuing East along the North line of said Quarter-Quarter Section to the Northeast corner thereof, being also the Northwest corner of the Southeast Quarter of the Northeast Quarter of Section 15; thence East, along said Quarter-Quarter Section to the Northeast corner thereof, being also the Northwest corner of the Southwest Quarter of the Northwest Quarter of Section 14, Township 54 North, Range 33 West; thence continuing East and along the North line of said Quarter-Quarter Section to the Northeast corner thereof and the Point of Beginning.



**APPENDIX I-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)1.

**APPENDIX J-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)3., 4. and 6.

**APPENDIX K-C
IS CONFIDENTIAL
IN ITS ENTIRETY**

20 CSR 4240-2.135(2)(A)3., 4. and 6.

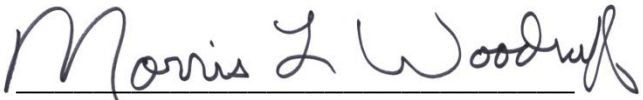
STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

**WITNESS my hand and seal of the Public Service Commission,
at Jefferson City, Missouri, this 18th day of September, 2020.**




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

September 18, 2020

File/Case No. SA-2021-0074

**Missouri Public Service
Commission**

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

County of Clinton, Missouri

County Commission Clerk
207 N. Main, Clinton County
Courthouse
P.O. Box 245
Plattsburg, MO 64477
clerk@clintoncomo.org

**Missouri Department of Natural
Resources**

Legal Department
1101 Riverside Drive, 2nd Floor
P.O. Box 176
Jefferson City, MO 65102-0176

**Missouri-American Water
Company**

Dean L Cooper
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

**Missouri-American Water
Company**

Timothy W Luft
727 Craig Road
St. Louis, MO 63141
Timothy.Luft@amwater.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.