



# BOARD OF WATER COMMISSIONERS

*President: Patrick Harris ♦ Vice President: John Zanmiller*

*Commissioners: Matt Anfang ♦ James Bykowski ♦ Melvin Carter III ♦ Lee Helgen ♦ Gregory Kleindl*

February 18, 2011

Elizabeth M. Murphy, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Subject: Release 34-63576

Dear Chairman Schapiro and Members of the Commission:

As General Manager of Saint Paul Regional Water Services (SPRWS) and on behalf of the Saint Paul Board of Water Commissioners (Board), I request that the requirement to register as "municipal advisors" only apply to those that actually provide advice. As such, the exclusion for local government officials should be expanded to include appointed board members.

SPRWS, providers of drinking water to over 415,000 residents in the Twin Cities, is governed by the Board. Five members of the Board are appointed by the Mayor of Saint Paul and approved by the Saint Paul City Council. Two members are appointed by the member suburban communities. While the Saint Paul City Charter requires three members of the Board be elected member of the Saint Paul City Council, the other four members may be citizen appointees. While citizen members receive a small stipend for attendance at scheduled Board meetings, the positions are voluntary and require a substantial amount of time to successfully be engaged in the governance of SPRWS.

SPRWS utilizes the City of Saint Paul Treasury unit and a financial consultant to advise staff and the Board in matters that include debt issuance, timing, structure and pricing of bond issuance. The members of the Board consider the information presented by the advisors and approve the issuance by resolution. The Board members are those that benefit from municipal advisors, they are not municipal advisors themselves.

To require appointed board members to register as municipal advisors will deter and prevent community members from volunteering to become involved in local government. SPRWS and the Board have benefitted from the local experience and expertise of these volunteers for decades and subjecting them to registration requirements and expense will certainly discourage future participation. We ask that you consider expanding the exclusion for the registration requirement to include appointed board members.

Sincerely,

Stephen P. Schneider  
General Manager

cc: Pat Harris

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## SAINT PAUL REGIONAL WATER SERVICES

Stephen P. Schneider, General Manager

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*Saint Paul Regional Water Services provides quality water services to the following cities:*

Arden Hills•Falcon Heights•Lauderdale•Little Canada•Maplewood•Mendota•Mendota Heights•Roseville•Saint Paul•West St. Paul