

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

In the Matter of Roeslein Alternative Energy Services,)
LLC's Request for a Commission Order Declining)
Jurisdiction, or, in the Alternative, Roeslein)
Alternative Energy Services, LLC's Application for)
Permission and Approval and a Certificate of)
Convenience and Necessity to Construct, Install,)
Own, Operate, Maintain, and Otherwise Control and)
Manage a Gas Gathering System)

Case No. GA-2016-0271

MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission for an extension of time, up to and including June 28, 2016, within which to respond to the Commission's Order directing Staff to file a Staff Recommendation or Status Report. In support, the undersigned states Staff's good cause as follows:

1. On April 12, 2016, Roeslein Alternative Energy Services, LLC's ("Roeslein LLC") filed a pleading ("Application") requesting either a ruling that the Commission does not have jurisdiction or alternatively for an application for a Certificate of Convenience and Necessity.

2. On April 13, 2016, the Commission ordered notice provided to the potentially affected counties, set a deadline to intervene, and ordered that Staff file its recommendation to the Commission on May 12, 2016.

3. The Application seeks certification of, or exemption from PSC jurisdiction for a proposed renewable natural gas processing operation and pipeline system that is unique and requires Staff to conduct a robust investigation.

4. On April 25, 2016, as part of that investigation, Staff submitted data requests to Roeslein LLC.

5. Pursuant to 4 CSR 240-2.090(2)(C), Roeslein LLC has twenty days to respond to the requests, making answers due after the May 12, 2016 deadline.

6. Staff respectfully requests an extension of time to allow the completion of the discovery, and provide time for follow-up between Staff and Roeslein LLC, if necessary.

WHEREFORE, Staff prays that the Commission will grant it an extension of time, up to and including June 28, 2016, within which to respond to the Commission's Order in this matter; and for such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Jacob T. Westen

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 6th day of May, 2016, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Jacob Westen