

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

In the Matter of the Application of)	
Terre Du Lac Corporation for a Small)	Case No. SR-2009-0219
Utility Rate Increase)	WR-2009-0218

**MOTION FOR EXTENSION OF TIME AND RESPONSE TO THE OFFICE OF
PUBLIC COUNSEL’S REQUEST FOR DISCUSSION MEDIATION**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and submits its *Motion for Extension of Time* as follows:

1. On November 21, 2008, Terre Du Lac Utilities Corporation (“Terre Du Lac” or “Company”) initiated a small company revenue increase request for its sewer services located in St. Francois and Washington Counties, Missouri.
2. On February 19, 2009, Staff provided the preliminary audit results from Staff’s initial audit and investigation to Office of Public Counsel (“OPC”) and to the Company.
3. On March 23, 2009, Staff provided a disposition agreement proposal packet to OPC and the Company which proposed a revenue decrease in the utility rates. Staff noted in the disposition agreement that there were going to be adjustments to the audits that most likely would result in no changes in utility rates.
4. On April 8, 2009, OPC filed a *Request for Discussion Mediation* to facilitate a discussion regarding the finalized audit results, timeline, and disposition agreement proposal which, per the 4 CSR 240-3.050(11), is to be completed on April 20, 2009.
5. Staff will provide all parties with the most recent auditing papers by Tuesday April 14, 2009.

6. Furthermore, the Company is actively attempting to secure a financier, which is necessary to make capital improvements to the water and sewer systems. Additionally, the Company is awaiting bids from potential operators in order to secure an operator for the utility systems.

7. Commission Rule 4 CSR 240-3.050(12) allows Staff and the Company to extend the deadline of 4 CSR 240-3.050(11), the disposition agreement filing date up to two (2) months, upon a written agreement.

8. Staff and Terre Du Lac hereby agree that it is necessary to extend the Small Utility Rate Increase process for thirty (30) days.

9. Staff notes that such an extension of time would allow OPC more time to review and evaluate Staff's update workpapers, and get clarification and additional information if necessary.

10. Therefore, Staff submits any mediation request be postponed for thirty (30) days to allow all parties to effectively review all workpapers and finalized disposition agreement that will be presented.

11. Staff will file an amended timeline reflecting the extension of time by April 14, 2009.

WHEREFORE, Staff respectfully requests the Commission order a thirty (30) day extension to the timeline and postpone beginning mediation for thirty (30) days in this small utility rate case.

Respectfully submitted,

/s/ Jaime N. Ott

Jaime N. Ott

Assistant General Counsel

Missouri Bar No. 60949

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-8700 (Telephone)

(573) 751-9285 (Fax)

jaime.ott@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of April, 2009.

/s/ Jaime N. Ott