

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

In the Matter of Missouri-American Water Company's        )  
Request for Authority to Implement a General Rate        ) Case No. WR-2015-0301  
Increase for Water and Sewer Service Provided in        )  
Missouri Service Areas                                        )

**CITY OF BRUNSWICK'S MOTION  
TO ALLOW LATE-FILED STATEMENT OF POSITION**

The City of Brunswick, Missouri, (City) files this Motion to request that the Missouri Public Service Commission (Commission) allow and accept the City of Brunswick's Statement of Position on the Issues that was filed approximately two minutes late. The City states the following in support of its Motion:

1. The Commission issued the *Amended Order Granting Motion for Leave to File Documents Out of Time* (Order) dated March 9, 2016.
2. The Order required the filing of the Parties' and Intervenors' Statements of Position by 12:00 p.m. on March 11, 2016.
3. The City filed it's Statement of Position at approximately 12:02 p.m. on March 11, 2016.
4. The City underestimated the time required to complete all of the information required by the Commission's Electronic Filing and Information System (EFIS).
5. Commission Rule 4 CSR 240-2.050(3)(B) allows the Commission to accept a late-filed document "where the failure to act was the result of excusable neglect or for other good cause shown."
6. None of the other Parties or Intervenors in this case will be placed at a disadvantage by allowing the late filing.

Therefore, the City respectfully requests that the Commission allow and accept the City's late-filed Statement of Position since the late filing was excusable.

Respectfully submitted,

*/s/ Gary Drag*

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Attorney for the City of Brunswick, Missouri

#### **CERTIFICATE OF SERVICE**

I certify that true and accurate copies of this Motion were sent by e-mail on March 11, 2016, to all parties on the official service list for this case.

*/s/ Gary Drag*

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Attorney for the City of Brunswick, Missouri