

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

In the Matter of Vicinity Energy Kansas City, Inc.'s Adjustment to Its PACC Tariff ) File No. HT-2021-0245  
)

**JOINT MOTION FOR EXTENSION OF TIME**

COME NOW Vicinity Energy Kansas City, Inc. (“Vicinity”) and the Staff of the Missouri Public Service Commission (“Staff”) and for their Joint Motion for Extension of Time state as follows:

1. On February 1, 2021, Vicinity filed revised tariff sheets along with supporting testimony and workpapers to implement an annual change in Vicinity’s Production Adjustment Cost Clause. Those tariffs bear an effective date of April 1. On February 2, the Commission issued an order setting a deadline of March 4 for the filing of a Staff recommendation concerning that PACC filing.

2. After the February 1 PACC filing, Vicinity has experienced a period of extraordinarily high gas costs, which may have a dramatic impact on future PACC adjustments. In order to proactively address these gas price spikes, Vicinity initiated discussions with Staff about possible modifications to the currently pending PACC filing.

3. In order to continue those discussions, Vicinity and Staff hereby seek to extend the deadline for the filing of Staff’s recommendation from March 4 to March 12. Given the April 1 effective date and the fact that there are no intervenors in this matter, this short extension should create no issues with the timely processing of this matter.

4. The Office of the Public Counsel has affirmatively stated that it has no objection to the granting of this joint motion.

WHEREFORE, Vicinity and Staff respectfully request that the Commission extend the deadline for the Staff Recommendation until March 12, 2021, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

BY: /s/ Lewis Mills  
Lewis Mills, MO Bar No 35275  
BRYAN CAVE LEIGHTON PAISNER LLP  
221 Bolivar Street, Suite 101  
Jefferson City, MO 65101  
573-556-6627 – Telephone  
573-556-7447 – Facsimile  
[lewis.mills@bryancave.com](mailto:lewis.mills@bryancave.com)

**ATTORNEY FOR VICINITY ENERGY  
KANSAS CITY, INC.**

BY: /s/ Casi Aslin  
Casi Aslin  
Senior Counsel  
Missouri Bar No. 67934  
Attorney for the Staff of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Mo 65102  
(573) 751-8517  
[casi.aslin@psc.mo.gov](mailto:casi.aslin@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 2nd day of March 2021.

/s/ Lewis Mills