BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Linda Beecham,) Complainant,) v.) Missouri-American Water Company,) Respondent.)

File No. WC-2020-0181

JOINT MOTION FOR EXTENSION FOR FILING RESPONSES TO ORDER DIRECTING FILING

COMES NOW the Respondent Missouri-American Water Company ("Missouri-American"), by and through the undersigned counsel, and on its behalf and that of the Staff of the Missouri Public Service Commission ("Staff"), respectfully states as follows:

1. On September 25, 2020, Missouri-American filed the *Affidavit of Tracie Figueroa* ("*Affidavit*").

2. On September 29, 2020, the Commission issued its *Order Directing Filing*, directing Missouri-American to "clarify its previous response regarding its compliance with the 10-year inspection and testing requirement of 20 CSR 4240-10.030(38)" by October 9, 2020. The *Order Directing Filing* also directed Staff to file a report concerning Missouri-American's *Affidavit* by October 15, 2020.

3. Staff has requested additional discussions with the Company in regard to the Company's meter change program. Missouri-American believes additional discussions could be helpful in clarifying not only the *Affidavit*, but also Staff's Report that Staff will ultimately provide to the Commission.

4. Missouri-American and Staff jointly move for a one-week extension for each filing deadline set forth in the *Order Directing Filing*.

5. This motion is not made to burden any party or to unnecessarily delay a resolution

in this matter, but in the hope of clarifying the responses that will ultimately be provided to the Commission by both parties.

WHEREFORE, Missouri-American moves on its behalf, as well as that of Staff, for the Commission to issue an order granting this Joint Motion for Extension and for the Commission to extend by one week each filing deadline in its *Order Directing Filing*.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

<u>/s/ Timothy W. Luft #40506</u> 727 Craig Road St. Louis, MO 63021 Telephone 314-996-2279 Email: <u>tim.luft@amwater.com</u>

BRYDON, SWEARENGEN & ENGLAND P.C.

By: /s/ Jennifer L. Hernandez Jennifer L. Hernandez #59814 312 E. Capitol Avenue P.O. Box 456 Jefferson City, MO 65102 Telephone: (573) 635-7166 Facsimile: (573) 635-0427 E-mail: jhernandez@brydonlaw.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been transmitted by electronic mail and United States Postal Mail, postage prepaid, to the Complainant, and by electronic mail to all counsel of record, this 9th day of October 2020.

/s/ Jennifer L. Hernandez