BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Missouri-American Water Company for Authority to Issue up to \$11,500,000 of Long-Term Debt and to Secure Same with a Mortgage on its Property.

File No. WF-2022-0066

MOTION FOR EXTENSION

COMES NOW Missouri-American Water Company (MAWC) and, for its *Motion for Extension*, states as follows to the Missouri Public Service Commission (Commission):

1. On September 1, 2021, MAWC filed its Application for certain financing authority pursuant to §§393.190 and 393.200 RSMo. and Commission Rules 20 CSR 4240-2.060, 20 CSR 4240-2.080, and 20 CSR 4240-10.125.

2. Also on September 1, 2021, the Commission issued an order directing Staff to file no later than September 10, 2021, a pleading specifying the date certain it would file its recommendation regarding MAWC's Application.

3. Staff filed a pleading on September 10, 2021, in which Staff stated it expected to file its recommendation no later than October 28, 2021, but should it complete its review prior to that date, it would submit its recommendation as soon as it is able.

4. On October 28, 2021, Staff filed its recommendation in this case. Commission Rule 20 CSR 4240-2.080(13) states that "Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the Commission." Commission Rule 20 CSR 4240-2.050(1) states, in part, that "the last day of the period so computed shall be included, unless it is a Saturday, Sunday, or legal holiday, in which case the period runs until the end of the next day which is not a Saturday, Sunday, or legal holiday." Thus, MAWC calculates its response to the *Staff Recommendation* would be due Monday, November 8, 2021.

5. MAWC has some questions and/or concerns with several of the conditions contained in the Staff recommendation and has contacted Staff to discuss same. In order for MAWC to have a better understanding of the Staff's conditions and to make a meaningful response to Staff's recommendation, MAWC believes additional time is necessary to continue its discussions with Staff. MAWC believes that an additional two weeks will be sufficient to conclude its discussions with Staff, as well as prepare and file an appropriate response.

6. Counsel for Staff has indicated that he has no objection to this extension.

WHEREFORE, MAWC requests a Commission order granting this *Motion for Extension* and providing MAWC until November 22, 2021, to file its response to the *Staff Recommendation*.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 5th day of November, 2021, to:

General Counsel's Office <u>staffcounselservice@psc.mo.gov</u> <u>kevin.thompson@psc.mo.gov</u>

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