

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

In the Matter of the Application of Liberty)	
Utilities (Missouri Water) LLC for Certificates of)	
Convenience and Necessity Authorizing it to)	Case Nos. WA-2020-0397
Install, Own, Acquire, Construct, Operate, Control,)	and SA-2020-0398
Manage, and Maintain a Water System and Sewer)	
System in Bolivar, Polk County, Missouri)	

UNOPPOSED MOTION TO SUSPEND PROCEDURAL SCHEDULE

COMES NOW Liberty Utilities (Missouri Water) LLC (“Liberty” or “Company”) and respectfully requests that the Missouri Public Service Commission (“Commission”) issue an order suspending the procedural schedule in this matter and cancelling the currently scheduled evidentiary hearing.

1. With certain exceptions not applicable here, RSMo. §393.320.1(1) defines a “large water public utility” as one that “regularly provides water service or sewer service to more than eight thousand customer connections.” RSMo. §393.320 does not separately define a “large sewer public utility.”

2. As stipulated and agreed to by the parties, Liberty regularly provides water and/or sewer service to approximately 8,274 customer connections. Statement of Uncontroverted Facts, ¶5.¹ More specifically, Liberty regularly provides water service or sewer service or water and sewer service to approximately 8,274 customer connections.

3. On July 28, 2021, the Commission issued its *Order Denying Motion for Partial Summary Determination and Issuing a Determination on the Pleadings that Liberty is not a Large Water Public Utility*, to be effective August 7, 2021.

¹ “Liberty regularly provides water and/or sewer service to approximately 8,274 customer connections (approximately 7,636 water and approximately 638 sewer), with approximately 8,079 unique water/sewer customers.” Statement of Uncontroverted Facts, ¶5.

4. Given this decision by the Commission, Liberty requests suspension of the procedural schedule in this matter to allow the Company time to consider its options with regard to the planned purchase of the Bolivar water and wastewater assets and to allow the Commission sufficient time to consider and rule on the motion for reconsideration that Liberty intends to file regarding the *Order Denying Motion for Partial Summary Determination and Issuing a Determination on the Pleadings that Liberty is not a Large Water Public Utility*.

5. Legal counsel for the Staff of the Commission and the Office of the Public Counsel have been consulted and neither object to the suspension of the procedural schedule and cancellation of the currently scheduled evidentiary hearing.

WHEREFORE, Liberty requests an order of the Commission suspending the procedural schedule in this matter and cancelling the currently scheduled evidentiary hearing.

Respectfully submitted,

/s/ Diana C. Carter

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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 2nd day of August, 2021, and sent by electronic transmission to the Staff of the Commission and the Office of the Public Counsel.

/s/ Diana C. Carter