

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

In the Matter of the Application of	)	
Lake Region Water & Sewer Company	)	
for a Certificate of Convenience and	)	Case No. WA-2005-0463
Necessity authorizing it to construct,	)	
install, own, operate, control, manage,	)	
and maintain a water and sewer system	)	
for the public located in an unincorporated	)	
area in Camden County, Missouri	)	

**JOINT MOTION TO EXTEND DATE FOR FILING  
STIPULATION AND AGREEMENT AND OTHER DEADLINES  
IN PROCEDURAL SCHEDULE**

Come now the parties and submit the following to the Commission:

1. On June 20, 2006, the Commission approved a procedural schedule in this matter and set today, August 11, 2006, as the date upon which the parties should file a stipulation and agreement. This date was proposed by the parties in their joint proposed procedural schedule which was filed June 19, 2006.

2. The filing of the stipulation and agreement by August 11, 2006 was dependent upon the timely achievement of tasks that preceded it in the scheduling order, namely, that by July 7, 2006 the Developers of Majestic Point Project and the Shawnee Bend Project, identified in Exhibit A and B to the Feasibility Study (Developers), would submit to Applicant, and to the Staff, all engineering, construction and installation costs for the pipelines referred to in the Feasibility Study; and that by August 4, 2006, Staff would report the results of its audit of those costs.

3. Despite good faith efforts, the cost data needed by the Staff for its audit did not arrive in full by July 7, 2006 and in turn: a) the Staff has been justifiably delayed in finalizing its audit of the cost data; b) the Applicant and the Developers have been justifiably delayed in

completing and executing the contract related to the subject pipeline projects; and c) the parties have been unable to finalize a stipulation and agreement for disposition of this case.

4. The results of the Staff's audit of the cost data were reported to the Applicant and Developers on August 10, 2006. Applicant and Developers have not yet had a meaningful opportunity to examine the report of the audit, finalize the required contract and consider the terms of a unanimous stipulation and agreement, and the parties respectfully request that the Commission extend the deadline for filing the same.

5. The parties propose that the date for filing a stipulation and agreement, and the other remaining deadlines set in the procedural schedule be extended as follows:

Friday, August 25, 2006	The parties file a stipulation and agreement. <sup>1</sup>
Wednesday, September 6, 2006	Staff files suggestions in support of stipulation.
Monday, September 11, 2006	Other parties file responses, if any, to Staff's supporting suggestions.

WHEREFORE, the parties respectfully request the Commission to extend the above deadlines in the procedural schedule as set out herein.

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<sup>1</sup> Filing of the stipulation by the parties is expressly conditioned upon the filing by Applicant before August 18, 2006 of a duly executed modification to the contracts identified as Exhibits A and B to the Feasibility Study in substantially the form attached to their initial proposed procedural schedule filed June 19, 2006. If the signed modification is not filed by that date, no stipulation will be filed and the matter will be subject to dismissal.

<p>OFFICE OF THE PUBLIC COUNSEL BY: <u>/s/ Michael F. Dandino by M.W.C.</u> Michael F. Dandino (24590) Deputy Public Counsel P.O. Box 2230 Jefferson City, MO 65102 (573) 751-4857 (573) 751-5559 Fax (573) 751-5562 Email: <a href="mailto:mike.dandino@ded.mo.gov">mike.dandino@ded.mo.gov</a></p>	
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