

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

In the Matter of the Application of	)	
Elm Hills Utility Operating Company, Inc.,	)	<b><u>File No. WA-2019-0235</u></b>
for a Certificate of Convenience and Necessity	)	

**JOINT MOTION FOR FURTHER EXTENSION OF TIME TO FILE STAFF'S  
RECOMMENDATION**

Under authority of and in accordance with 4 CSR 240-2.080, Elm Hills Utility Operating Company, Inc. ("Elm Hills"), the Missouri Public Service Commission Staff ("Staff"), and the City of Sedalia, Missouri ("City") (collectively, "Movants") jointly request the Commission issue an order further extending – to July 22, 2019 – the date for Staff to file its recommendation regarding Elm Hills' application for a Certificate of Convenience and Necessity ("CCN"). In support of their request, Movants state:

1. On February 12, 2019, Elm Hills filed an application requesting the Commission grant it a CCN to acquire, own, install, construct, operate, control, manage, and maintain water and sewer systems in Pettis County, Missouri, in an area known as Stone Creek, near or within the City of Sedalia.

2. On February 13, the Commission issued its *Order Directing Notice and Setting Dates for Submission of Intervention Requests and Staff Recommendation* directing Staff to file a recommendation regarding the application no later than April 15, 2019.

3. On April 3, 2019, the City of Sedalia applied to intervene in this matter. That application stated, *inter alia*, the service area for which Elm Hills seeks a CCN is within City's corporate limits.

4. Since it filed its application, Elm Hills and Staff have had a productive technical discussion and engaged in discovery to answer questions and issues raised by the application. Additionally, Elm Hills and City are in discussions concerning what effect, if any, the fact the subject service area is within City's corporate limits will have on Elm Hills' desire to pursue its application.

5. To allow time for further discussion, the parties requested, and the Commission granted, an extension of the date for Staff's recommendation in this case, which currently is due June 20, 2019.

6. Additional discussions continue and Movants believe more time is required to complete those discussions. Accordingly, Movants have agreed to request the filing date for Staff's recommendation be further extended to July 22, 2019.

**WHEREFORE**, for the reasons previously stated, Movants respectfully request the Commission grant the requested extension and order Staff to file its recommendations no later than July 22, 2019.

Respectfully submitted,

**/s/ Karen E. Bretz**

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**/s/ L. Russell Mitten**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 6th day of June 2019.

**/s/ L. Russell Mitten**