

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

In the Matter of the Application of South Central            )  
MCN LLC for Approval of Transfer of Assets and            )            File No. EA-2016-0036  
a Certificate of Convenience and Necessity                )

**SECOND JOINT MOTION FOR EXTENSION OF TIME  
TO FILE STAFF RECOMMENDATION**

**COMES NOW** South Central MCN LLC (SCMCN) and the City of Nixa (City), by and through counsel, and requests a three-week extension from October 15, 2015 to November 5, 2015 for the Staff to file its response to the Missouri Public Service Commission’s September 16, 2015 Order Directing Filing of Recommendation regarding the Application of SCMCN. In support thereof, SCMCN and the City state, as follows:

1. On August 19, 2015, SCMCN filed an Application pursuant to Sections 393.170 and 393.190 RSMo., 4 CSR 240-2.060, 4 CSR 240-3.105, and 4 CSR 240-3.110 for an Order of the Commission disclaiming jurisdiction under Section 393.190.1 RSMo. and confirming the inapplicability of 4 CSR 240-3.110 to a certain transaction including the transfer of the certain existing transmission assets to SCMCN by the City pursuant to an Asset Purchase Agreement (“APA”) between SCMCN and the City of Nixa or, in the alternative, authorizing SCMCN and the City of Nixa to execute any and all documents necessary to effectuate the transaction in question.
2. On August 21, 2015, the Commission issued an Order Directing Filing of Recommendation regarding the Application by September 10, 2015, by the Staff.
3. On August 26, 2015, the City filed an Application to Intervene. On September 9, 2015, the Commission issued an Order Granting Intervention to the City.

4. On September 10, 2015, Staff, on behalf of itself and SCMCN, filed a Motion for Extension of Time to File Staff Recommendation, requesting a one-week extension until September 17. The Commission issued an Order granting the motion that same day.

5. On September 16, 2016, SCMCN, on behalf of itself and the City, filed a Motion for Extension of Time to File Staff Recommendation, requesting a four-week extension until October 15. The Commission issued an Order granting the motion the same day.

6. As a result of the two prior extensions of time, good progress has been made on resolving certain outstanding matters, but more time is needed to finalize them. Accordingly, SCMCN and the City request that the Staff be granted an additional three-week extension from October 15, 2015 to November 5, 2015 to file its recommendation.

7. Counsel for Staff has authorized the undersigned counsel to state that the Staff supports the Second Joint Motion for Extension of Time to File Staff Recommendation.

8. Counsel for the Office of the Public Counsel (“Public Counsel”) has authorized the undersigned counsel to state that the Public Counsel has no objection to the Second Joint Motion for Extension of Time to File Staff Recommendation.

9. Allowing this additional three-week extension of time is in the public interest because it allows the parties to firm up certain outstanding issues that will provide more complete information to Staff, which will assist them in making a more informed and complete recommendation.

10. SCMCN and the City understand that this motion for an additional three-week extension of time may impact SCMCN’s request for a decision from the Commission on its Application no later than December 4, 2015, as reflected in SCMCN’s Amended Motion for Expedited Treatment filed on September 16, 2015. Accordingly, SCMCN will also be filing a

Second Amended Motion for Expedited Treatment asking for a decision no later than December 31, 2015 to account for the additional three-week delay in Staff's Recommendation. SCMCN and the City apologize for any inconvenience this delay may cause.

**WHEREFORE**, SCMCN and the City request that the Staff be granted an extension from October 17, 2015 to November 5, 2015 to file its recommendation.

Respectfully submitted,



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ATTORNEYS FOR SOUTH CENTRAL  
MCN

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14th day of October, 2015.



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Terry M. Jarrett