

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

Ralph Rudolph,)	
)	
Complainant,)	
)	
v.)	<u>File No. WC-2022-0162</u>
)	
Missouri-American Water Company,)	
)	
Respondent.)	

**MOTION FOR EXTENSION RELATED TO
RESPONSE TO STAFF’S REPORT AND RECOMMENDATIONS**

COMES NOW the Respondent Missouri-American Water Company (“MAWC”), by and through the undersigned counsel, and pursuant to Commission Rule 20 CSR 4240-2.050, hereby requests the Missouri Public Service Commission (“Commission”) grant MAWC an extension of time in which to file its response to Staff’s *Report and Recommendations*. In support of its request, MAWC respectfully states as follows:

1. On December 16, 2021, Ralph Rudolph filed his complaint against MAWC. On March 1, 2022, Staff filed its *Report and Recommendations*.

2. Commission Rule 20 CSR 4240-2.080(13) states: “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.” Thus, MAWC’s deadline to file a response to Staff’s *Report and Recommendations* currently would be March 11, 2022.

3. MAWC requires additional time to prepare its response, given the more global nature of many of Staff’s recommendations. Accordingly, MAWC requests that the Commission extend the deadline for MAWC’s response to the *Report and Recommendations* until March 30, 2022.

4. Counsel for MAWC has contacted the parties to this case concerning this request. Counsel for both the Staff of the Commission and the Office of the Public Counsel have indicated they have no objection to this *Motion for Extension Related to Response to Staff's Report and Recommendations*. MAWC counsel has received no response from Complainant.

WHEREFORE, Missouri-American Water Company respectfully requests for the Commission to issue an order granting this *Motion for Extension Related to Response to Staff's Report and Recommendations*, and extend until March 30, 2022, the filing deadline for MAWC's response to Staff's *Report and Recommendations*.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By: /s/ Jesse W. Craig
Dean L. Cooper Mo. Bar #36592
Jesse W. Craig Mo. Bar #71850
312 East Capitol Avenue
P. O. Box 456
Jefferson City, Missouri 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 634-7431
Email: dcooper@brydonlaw.com
jcraig@brydonlaw.com

**ATTORNEYS FOR MISSOURI AMERICAN
WATER COMPANY**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, this 8th day of March 2022.

General Counsel's Office
staffcounsel@psc.mo.gov
Karen.Bretz@psc.mo.gov
Paul.Graham@psc.mo.gov

Office of the Public Counsel
opcservice@opc.mo.gov

Ralph Rudolph
Ralphfish99@gmail.com

/s/ Jesse W. Craig