

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

In the Matter of the Joint Application of)
West 16th Street Sewer Company, W.P.C.)
Sewer Company, Village Water and Sewer)
Company, Inc. and Raccoon Creek Utility)
Operating Company, Inc., for Raccoon Creek)
to Acquire Certain Sewer Assets and,)
In Connection Therewith, Issue Indebtedness)
and Encumber Those Assets)

File No. SM-2015-0014

**MOTION FOR EXTENSION OF TIME TO FILE STAFF'S RECOMMENDATION, OR IN
THE ALTERNATIVE STATUS REPORT**

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and files this *Motion for Extension of Time to File Staff's Recommendation or in the alternative Status Report*, respectfully requesting the Missouri Public Service Commission grant its *Motion* extending the date for filing Staff's Recommendation, or in the alternative Status Report in this proceeding from September 10, 2014 to September 30, 2014¹. In support of this motion, Staff states as follows:

1. On July 14, Applicants, West 16th Street Sewer Company, ("West 16th"), W.P.C. Sewer Company, ("WPC"), Village Water and Sewer Company, Inc., ("Village") and Raccoon Creek Utility Operating Company, Inc., ("Raccoon Creek") filed their *Joint Application and, If Necessary, Motion for Waiver*. Applicants requested that the Commission approve Raccoon Creek's agreements to purchase West 16th, WPC, and Village's sewer assets. Raccoon Creek would partially finance the purchase via debt

that would encumber those assets, and also asks the Commission to approve the same. Finally, Raccoon Creek wishes to become regulated by the Commission, and, thus, also wishes for the Commission to grant it a certificate of convenience and necessity to own and operate those sewer assets.

2. On August 13, the Commission issued its *Order Directing Filing* directing Staff to file its recommendation no later than September 10.

3. Staff continues its investigation related to this application; however, due to the unique nature of the financial transaction and its interconnected nature with file number WO-2014-0340, also before the Commission, Staff is in the process of including a preliminary rate feasibility study for each system into its recommendation and requires more time to complete its recommendation. Staff requests until September 30 to file its recommendation.

4. Staff has contacted the other parties in this case and they have no objection to Staff's request.

WHEREFORE, Staff requests the Commission grant its *Motion for Extension of Time to File Staff's Recommendation, or in the alternative Status Report*.

¹ All dates referenced are 2014 unless otherwise stated.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal
Assistant Staff Counsel
Missouri Bar No. 65487

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8517 (Telephone)
(573) 751-9284 (Fax)
Alexander.Antal@psc.mo.gov (e-mail)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served to all counsel of record by hand delivery, electronic mail or First Class United States Mail this 10th day of September 2014.

/s/ Alexander Antal