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

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In the Matter of Missouri-American Water ) Company's Application for a Certificate of ) Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Sewer System in and around the City of Taos, Missouri

File No. SA-2021-0120

## **SECOND MOTION FOR EXTENSION**

COMES NOW Missouri-American Water Company ("MAWC"), and, as its Second Motion for Extension, states as follows to the Missouri Public Service Commission ("Commission"):

1. On April 12, 2021, the Staff of the Commission ("Staff") filed its Staff Recommendation to Grant Certificate of Convenience and Necessity. Subsequently, MAWC moved for an extension of the time to respond to the Staff Recommendation and was granted an extension until May 6, 2021.

2. Since that time, the MAWC and Staff have exchanged additional information. However, neither believes that this process will be completed by May 6, 2021. Accordingly, MAWC requests that the date to respond to the Staff Recommendation be further extended until May 20, 2021.

3. Staff counsel has indicated that Staff supports this Second Motion for Extension.

WHEREFORE, MAWC requests that the Commission further extend the deadline for MAWC's response to the Staff Recommendation until May 20, 2021, and grant such other and

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further relief as the Commission considers just in the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 6<sup>th</sup> day of May, 2021, to:

Ron Irving General Counsel's Office <u>staffcounselservice@psc.mo.gov</u> <u>ron.irving@psc.mo.gov</u>

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