

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

In the Matter of Missouri-American Water Company)
for a Certificates of Convenience Necessity)
Authorizing it to Install, Own, Acquire, Construct,) **File No. SA-2021-0074**
Operate Control, Manage and Maintain Sewer)
Systems in and around the City of Trimble, Missouri)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and for its *Motion for Extension*, respectfully states as follows:

1. On September 17, 2020, Missouri-American Water Company (“MAWC”) filed an *Application* with the Missouri Public Service Commission (“Commission”) requesting a Certificate of Convenience and Necessity (“CCN”) to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in and around Trimble, Missouri.

2. On September 18, 2020, the Commission issued an *Order Directing Notice, Setting Date for Intervention, and Ordering Staff Recommendation* (“Order”). In its Order, the Commission directed Staff to file, no later than November 2, 2020, a recommendation.

3. In an attempt to provide its recommendation before November 2, 2020, Staff issued several data requests (“DRs”) and follow-ups to those data requests. As of October 26, 2020, there were more than ten (10) DRs with a due date after November 2, 2020, unanswered by MAWC.

4. In order for Staff to receive and analyze the data requests and deliver a recommendation to the Commission, Staff requests a 30 day extension. Staff anticipates a filing date of no later than December 2, 2020.

WHEREFORE, Staff respectfully submits this *Motion for Extension*, and hereby requests the Commission approve Staff's anticipated December 2, 2020, date for filing its recommendation in this matter.

Respectfully submitted,

/s/ Ron Irving

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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 counsel of record this 27th day of October, 2020.

/s/ Ron Irving