DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)	
Confluence Rivers Utility Operating Company,)	
Inc., for a Certificate of Convenience and)	File No. SA-2022-0299
Necessity and to Acquire Certain Sewer Assets)	

REQUEST FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Request for Extension of Time*, states as follows:

- 1. On April 28, 2022, Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers") filed an application with the Missouri Public Service Commission ("Commission") requesting that the Commission grant it a Certificate of Convenience and Necessity ("CCN") to acquire, own, install, construct, operate, control, manage, and maintain a sewer system in Madison County, Missouri.
- 2. On April 29, 2022, Staff was ordered to file a recommendation or status report regarding Confluence Rivers' CCN application no later than June 15, 2022.
 - 3. Staff requests a 60-day extension for the following reasons:
- a) Scheduling conflicts between Confluence Rivers, local system operators and Staff have delayed on-site inspections of the system being acquired;
- b) Staff is awaiting a response to a Sunshine Request from the Department of Natural Resources ("DNR"). In addition to providing important historical information about the assets being purchased, compliance information from the DNR is crucial for evaluating a purchasing company's ability to successfully operate the system.

4. For the reasons mentioned in Paragraph 3 above, Staff requests an additional 60 days to complete its investigation and recommendation. Staff will file its recommendation earlier, if possible.

WHEREFORE, Staff respectfully requests that the Commission will grant a 60-day extension to complete and file its recommendation; and such other and further relief as the Commission deems just in these circumstances.

Respectfully Submitted,

/s/ Don Cosper

Don Cosper Legal Counsel Missouri Bar No. 73231 P.O. Box 360 Jefferson City, Mo 65102-0360 (573) 751-4140 (Telephone) (573) 751-9285 (Facsimile) don.cosper@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

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 13th day of June, 2022.

/s/ Don Cosper