

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Osage)
Utility Operating Company, Inc. to)
Acquire Certain Water and Sewer Assets)
and for a Certificate of Convenience and) File No. WA-2019-0185
Necessity,) File No. SA-2019-0186
)
Plaintiff,)
)
)

**RESPONSE OF GREAT SOUTHERN BANK TO STAFF MOTION FOR ADDITIONAL
EXTENSION, AND REQUEST TO BIFURCATE**

COMES NOW Great Southern Bank, a Missouri chartered trust company (“GSB”), by and through its counsel, and, in response to the staff’s Motion for an additional Extension to file its recommendations in this matter, states as follows:

1. GSB is a Missouri chartered trust company, and operates under banking regulations.
2. Banking regulations require GSB to divest itself of assets acquired through failed loans under a specified timeline.
3. GSB cannot dispose of the remaining property at Reflections subdivision for its highest and best use as development property, before the water and sewer systems that serve the development have been transitioned to a qualified operator.
4. GSB appreciates that the staff is working diligently to provide a thorough recommendation for each of the systems involved in this docket and that other systems involved provide additional issues, as the result of the involvement of bankruptcy proceedings.
5. A continuing delay in staff’s recommendation, however, is problematic for GSB, because of the banking regulations under which it operates.

6. GSB does not object to the current request for an additional extension to May 24, 2019. However, it would strongly object to any further extension.

7. In the event that staff believes any further extension could be required in order to allow it to provide a recommendation for all systems involved in this docket, GSB would request that the proceeding be bifurcated, so that staff be required to file its recommendation for the Reflections systems, no later than May 24, 2019; and any further extension apply solely to the other systems involved in this docket.

WHEREFORE, for the foregoing reasons, Great Southern Bank respectfully requests that, should the extension requested by staff be granted, such grant be made subject to the condition that no further extension be granted, in regard to staff's recommendation for the Reflections systems.

Respectfully submitted,

**SANDBERG, PHOENIX & VON
GONTARD, P.C.**

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/Sharon Ludwig