

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

In the Matter of the Application of South Central )  
MCN LLC for Approval of Transfer of Assets and )  
a Certificate of Convenience and Necessity )

**File No. EA-2016-0036**

**STAFF MOTION FOR ADDITIONAL TIME TO FILE STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and files the instant Motion For Additional Time To File Staff Recommendation from Thursday June 2, 2016, to Wednesday, June 22, 2016.

In support of the Staff’s Motion, the states as follow:

1. On May 2, 2016, South Central MCN, LLC (“SCMCN”), the City of Nixa, Missouri (“Nixa”), and City Utilities of Springfield (“CU”), by and through their respective counsels, filed a Joint Motion For Commission Approval Of Settlement Agreement, Settlement Agreement and Exhibits.

2. On May 3, 2016, the Commission issued an Order Requiring Filing Of Recommendation And Responses in which it directed the Staff to no later than June 2, 2016, to file responses to the following which shall comprise a recommendation on the merits: (a) August 19, 2015 Application of SCMCN for a certificate of convenience and necessity; (b) May 2, 2016, Joint Motion For Commission Approval Of Settlement Agreement; and (c) May 3, 2016, Waiver Of Hearing And Motion To Withdraw Motion For Summary Disposition.

3. The Asset Purchase Agreement, by and between SCMCN and Nixa, which was filed with the Application has been amended twice, the first time on August 14, 2015 and the second time on February 12, 2016. The filing of the

Settlement Agreement on May 2, 2016, was the first time the Staff saw the Settlement Agreement.

4. Due to the press of other Commission cases and matters, the Staff only on late Friday, May 20, 2016, submitted data requests to SCMCN regarding the Settlement Agreement and related items. SCMCN was able to provide answers to the Staff on May 31, 2016. The Staff needs time beyond the June 2, 2016 date set by the Commission Order of May 3, 2016, in order to file its recommendation. The Staff is requesting an additional three (3) weeks until June 22, 2016, to file its recommendation.

5. The Staff does not request this additional time to unduly delay these proceedings. The Staff apologizes for any inconvenience this request may cause the Commission or the parties. Undersigned Staff counsel has contacted counsel for SCMCN, Nixa, CU, and the Office of the Public Counsel ("Public Counsel") and each has indicated that the separate parties do not object to an extension of time to June 22, 2016, for the Staff to file its recommendation.

**WHEREFORE**, the Staff files its Motion For Additional Time To File Staff Recommendation until Wednesday, June 22, 2016.

Respectfully submitted,

**/s/ Steven Dottheim**

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Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Staff Motion For Additional Time To File Staff Recommendation* have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1<sup>st</sup> day of June, 2016.

**/s/ Steven Dottheim**