

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

In the Matter of Taney County Utilities)
Corporation's Request for a Small Water and) **CASE NO.: WR-2004-0450**
Sewer Company Rate Increase.)

**STAFF'S MOTION FOR EXTENSION
OF TIME TO FILE REPORT REGARDING COMPLIANCE**

COMES NOW the Staff of the Missouri Public Service Commission and, for its Motion for Extension of Time to File Report Regarding Compliance, states to the Missouri Public Service Commission as follows:

1. On May 13, 2004, the Commission issued its Order Approving Small Company Rate Increase. In that Order, the Commission ordered the Staff to file a report within one year after the date of the Order, indicating whether Taney County Utilities Corporation ("Company") had complied with the requirements imposed by the Order. The Staff did not file its report on the date specified, and on May 25, 2005, the Commission issued its Order Directing Staff to File Report, in which it ordered the Staff to file the subject report by no later than June 15, 2005.

2. Due to the press of other business, the Staff has not been able to complete the preparation of the required report, and will not be able to complete its work on the report by the June 15 deadline. In addition, the undersigned counsel for the Staff will be traveling on Commission business during the week of June 13, and will not return to the office until Thursday, June 16.

3. Rule 4 CSR 240-2.050 (3) (A) provides that when an act is required by Commission order to be performed by a specified date, the Commission, at its discretion, may

order the period enlarged before the expiration of the period originally prescribed or as extended by a previous order.

4. The Staff anticipates that it will be able to complete and file the report on the Company's compliance with the Order Approving Small Company Rate Increase by no later than June 20, 2005.

5. The Staff therefore requests that the time for filing the report on the Company's compliance with the Order Approving Small Company Rate Increase be extended to June 20, 2005. No party will be harmed by the granting of the requested extension of time.

WHEREFORE, the Staff requests that the Commission extend by five days the deadline by which the Staff must submit its report in this case, and that it direct the Staff to file its report by no later than June 20, 2005.

Respectfully Submitted,

DANA K. JOYCE
General Counsel

/s/ **Keith R. Krueger**

Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (telephone)
(573) 751-9285 (facsimile)
keith.krueger@psc.mo.gov (e-mail)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 14th day of June 2005.

/s/ Keith R. Krueger
Keith R. Krueger