

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

Staff of the Public Service Commission	)	
Of the State of Missouri,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. TC-2005-0357
	)	
Cass County Telephone Company	)	
Limited Partnership,	)	
	)	
Respondent.	)	

**STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
ATTORNEY GENERAL'S MOTION TO INTERVENE**

COMES now the Staff of the Missouri Public Service Commission and for its motion states:

1. During the on-the-record presentation on January 11, 2006, the Attorney General made an oral motion to intervene in this case. The Attorney General filed a written application to intervene later that same day.
2. Pursuant to Commission Rules 4 CSR 240-2.080 (15) and 4 CSR 240-2.050 (1), responses are due no later than January 23, 2006.
3. Pursuant to Commission Rule 4 CSR 240-2.050 (3), the Commission may enlarge a prescribed time period.
4. The Staff requests an extension to January 27, 2006 to file its response to the Attorney General's application for intervention. The Staff continues to review the Attorney General's concerns. The Staff notes that the transcript of the on-the-record presentation became available today, January 20, 2006.

5. The Staff has been authorized to state that Cass County Telephone Company Limited Partnership and the Office of the Public Counsel are not opposed to this motion.

WHEREFORE, the Staff requests an extension to January 27, 2006, to file its response to the Attorney General's application to intervene.

Respectfully Submitted,

**/s/ William K. Haas**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 20<sup>th</sup> day of January, 2006.

/s/ William K. Haas