BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Missouri-American Water Company for a Certificate of Convenience and Necessity Authorizing it to Install, Own, Acquire, Construct, Operate, Control, Manage and Maintain a Water and Sewer System in and Around the City of Eureka, Missouri

File No. WA-2021-0376

SECOND MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Second Motion for Extension*, states as follows:

1. On April 26, 2021, Missouri-American Water Company ("MAWC" or "Company") filed applications with the Missouri Public Service Commission ("Commission") requesting Certificates of Convenience and Necessity ("CCNs") to install, own, acquire, construct, operate, control, manage, and maintain a water system (WA-2021-0376) and a sewer system (SA-2021-0377) in and around the City of Eureka, Missouri. On that same date, MAWC filed its *Motion to Consolidate*, requesting the Commission issue an order consolidating File Nos. WA-2021-0376 and SA-2021-0377, with File No. WA-2021-0376 being the lead case. The Commission originally directed its Staff to file its Recommendation on or before June 28, 2021.

2. On June 28, 2021, Staff requested an extension until September 27, 2021, in order to complete its investigation and file its recommendation, and on that same day, the Commission granted Staff's request.

3. While Staff has completed its investigation of MAWC's Application, it is still in the process of completing its report and does not anticipate being able to submit its report by the current filing date of September 27, 2021. Therefore, to provide additional time for Staff to finalize its Recommendation, Staff requests a short extension until October 1, 2021. Staff Counsel has communicated with counsel for MAWC, and they have indicated they do not oppose Staff's request.

WHEREFORE, Staff respectfully submits its *Second Motion for Extension* for the Commission's information and consideration and hereby prays the Commission order Staff to file its recommendation in this matter no later than October 1, 2021; and grant such other and further relief as the commission considers just in the circumstances.

Respectfully submitted,

<u>/s/ Mark Johnson</u>

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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 parties and/or counsel of record on this 23rd day of September, 2021.

<u>/s/ Mark Johnson</u>