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

In the Matter of Missouri-American Water	)	
Company for a Certificate of Convenience	)	
and Necessity Authorizing it to Install,	)	
Own, Acquire, Construct, Operate,	)	File No. WA-2021-0391
Control, Manage and Maintain a Water	)	
System and Sewer System in and around	)	
the City of Garden City, Missouri.	)	

## **MOTION FOR EXTENSION**

**COMES NOW** Missouri-American Water Company (MAWC) and, as its *Motion for Extension*, states as follows to the Missouri Public Service Commission (Commission):

- 1. On May 7, 2021, MAWC filed an Application with the Commission for certificates of convenience and necessity associated with its possible purchase of the City of Garden City water and sewer assets.
- 2. On July 8, 2021, the Staff of the Commission filed a *Motion for Extension* requesting an extension of its deadline to file a recommendation until October 6, 2021. The Commission granted that extension by order issued July 14, 2021.
- 3. On October 6, 2021, Staff filed its recommendation in this case. Commission Rule 20 CSR 4240-2.080(13) states that "Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the Commission." Commission Rule 20 CSR 4240-2.050(1) states, in part, that "the last day of the period so computed shall be included, unless it is a Saturday, Sunday, or legal holiday, in which case the period runs until the end of the next day which is not a Saturday, Sunday, or legal holiday." Thus, MAWC's response to the *Staff Recommendation* would be due today.

- 4. As a result of recent personnel changes and other matters related to this case, MAWC is not in a position to respond to the *Staff Recommendation* today. Accordingly, MAWC moves for an extension of the time for it to respond to the *Staff Recommendation* until October 25, 2021.
  - 5. Counsel for Staff has indicated that he has no objection to this extension.

WHEREFORE, MAWC requests a Commission order granting this *Motion for Extension* and providing MAWC until October 25, 2021, to file its response to the *Staff Recommendation*.

Respectfully submitted,

Dean L. Cooper

Mo. Bar 36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102-0456

Telephone: (573) 635-7166

dcooper@brydonlaw.com

Timothy W. Luft, MBE #40506

Corporate Counsel

MISSOURI-AMERICAN WATER COMPANY

727 Craig Road

St. Louis, MO 63141

(314) 996-2279 telephone

(314) 997-2451 facsimile

timothy.luft@amwater.com

ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 18<sup>th</sup> day of October, 2021, to:

General Counsel's Office <u>staffcounselservice@psc.mo.gov</u> <u>mark.johnson@psc.mo.gov</u> Office of the Public Counsel opcservice@opc.mo.gov

D1.Com

3