

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

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| In the Matter of the Application of |) | |
| Elm Hills Utility Operating Company, Inc., |) | <u>File No. WA-2019-0235</u> |
| for a Certificate of Convenience and Necessity |) | |

**MOTION FOR FURTHER EXTENSION OF TIME
TO FILE STAFF'S RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission ("Staff"), and requests the Commission issue an order further extending, until October 21, 2019, the date by which Staff must file its recommendation regarding the application of Elm Hills Utility Operating Company, Inc. ("Elm Hills") for a Certificate of Convenience and Necessity ("CCN"). In support of its request, Staff states as follows:

1. On February 12, 2019, Elm Hills filed its application requesting the Commission grant a CCN allowing it to acquire, own, install, construct, operate, control, manage, and maintain water and sewer systems in Pettis County, Missouri, in an area known as Stone Creek.

2. On February 13, the Commission issued its *Order Directing Notice and Setting Dates for Submission of Intervention Requests and Staff Recommendation* directing Staff to file a recommendation regarding the application no later than April 15, 2019.

3. On April 3, 2019, the City of Sedalia ("City") applied to intervene in this matter. That application stated, *inter alia*, the service area for which Elm Hills seeks a CCN is within the City's corporate limits.

4. It is Staff's understanding that Elm Hills and the City are still in discussions concerning what effect, if any, the fact the subject service area is within City's corporate limits will have on Elm Hills' desire to pursue its application.

5. The City's decision whether or not to grant Elm Hills a franchise to operate within its corporate boundaries could have an impact on Staff's ultimate recommendation in this matter. Therefore, to allow additional time for Elm Hills and the City to further discuss this matter, and additional time thereafter for Staff to finalize its recommendation, Staff requests an extension of the date for Staff's recommendation in this case –currently due July 22, 2019 – to October 21, 2019.

6. Staff notes that once Elm Hills and the City reach an agreement, Staff will endeavor to file its recommendation in this matter as soon as practicable thereafter.

7. Staff has authority to state that Elm Hills does not oppose this motion and that the City is in support of this motion.

WHEREFORE, for the reasons previously stated, Staff respectfully requests the Commission grant the requested extension and order Staff to file its recommendation no later than October 21, 2019.

Respectfully submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 18th day of July 2019.

/s/ Karen E. Bretz