# 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, Control, Manage	)	File No. WA-2022-0229
and Maintain a Water and Sewer System in	)	
and around an areas of Pettis County,	)	
Missouri (Monsees Lake Estates Subdivision).	)	

## MOTION TO FOR LEAVE TO AMEND APPLICATION AND AMENDMENT TO THE APPLICATION

**COMES NOW** Missouri-American Water Company (MAWC) and, as its *Motion for* Leave to Amend Application and Amendment to the Application, in accordance with 20 CSR 4240-2.080(18), states as follows to the Missouri Public Service Commission (Commission):

1. On February 25, 2022, MAWC filed an *Application and Motion for Waiver* ("*Application*") requesting permission and approval for a certificate of convenience and necessity to install, own, acquire, construct, operate, control, manage, and maintain a water system and sewer system in Pettis County, Missouri in a subdivision known as Monsees Lake Estates Subdivision. The cases were assigned File Nos. WA-2022-0229 and SA-2022-0230. On March 14, 2022, the Commission issued its order consolidating the cases with File No. WA-2022-0229 being the lead case.

#### **MOTION FOR LEAVE**

2. MAWC's *Application*, among other things, included as Appendix C, a legal description of the area sought to be certificated, and Appendix D, a map of the area sought to be certificated. After discussion, with the Staff of the Commission, MAWC believes that both that legal description and map should be modified. Accordingly, by this pleading, MAWC seeks the Commission's leave to amend its *Application* to include this issue as described herein.

3. Commission Rule 20 CSR 4240-2.080(18) provides, in part, that a pleading may be amended at any time by leave of the Commission, if no responsive pleading has been filed. No responsive pleading has yet been filed in this matter. Staff has been ordered to file a recommendation by April 25, 2022. MAWC believes that a grant of the requested leave will not prejudice the parties and will aid in the efficient processing of this *Application*.

#### AMENDMENT TO THE APPLICATION

4. MAWC provides the attached <u>Appendix C - Amended</u> and <u>Appendix D - Amended</u> and asks that the Commission consider these to replace and amend Appendix C and Appendix D to the Application, respectively.

**WHEREFORE**, MAWC requests a Commission issue its order granting MAWC'S motion for leave to amend its *Application* and consider the *Application* amended as stated herein.

Respectfully submitted,

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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  $25^{th}$  day of March, 2022, to:

D1.Com

General Counsel's Office Office of the Public Counsel <a href="mailto:staffcounselservice@psc.mo.gov">staffcounselservice@psc.mo.gov</a> <a href="mailto:opcservice@opc.mo.gov">opcservice@opc.mo.gov</a>

3