# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of	)	
Confluence Rivers Utility Operating Company	, )	
Inc., for Authority to Acquire Certain Water	)	File No. WA-2021-0425
and Sewer Assets and for Certificates of	)	File No. SA-2021-0426
Convenience and Necessity	)	

## REQUEST FOR EXTENSION OF TIME

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its *Request for Extension of Time*, states as follows:

- 1. On June 25, 2021, Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers") filed an application with the Missouri Public Service Commission ("Commission") requesting that the Commission grant it a Certificate of Convenience and Necessity ("CCN") to acquire, own, install, construct, operate, control, manage, and maintain water and sewer systems in Benton, Camden, Clay, Pettis and Platte counties in Missouri.
- 2. On July 13, 2021, Staff was ordered to file a recommendation regarding Confluence Rivers' CCN applications no later than October 5, 2021.
  - 3. Staff requests a 30-day extension for the following reasons:
- a) A delay receiving engineering reports and planned improvements for each of the systems being acquired due to the voluminous nature of the files requested through email. Staff ultimately requested this data through a data request submitted in EFIS, which resulted in a further delay;
- b) Scheduling conflicts between Confluence Rivers, local system operators and Staff to conduct on-site inspections of each of the facilities being acquired:
  - c) Staff is awaiting a response to a Sunshine Request from the Department of

Natural Resources ("DNR"). Staff received notification from DNR to expect the response to the Sunshine Request no later than October 21, 2021; and

- d) There is currently one outstanding data request that is due October 11, 2021.
- 4. For the reasons mentioned in Paragraph 3 above, Staff requests an additional 30 days to complete its investigation and recommendation.

WHEREFORE, Staff respectfully requests that the Commission will grant it until November 4, 2021 to complete and file its recommendation; and such other and further relief as the Commission deems just in these circumstances.

Respectfully Submitted,

#### /s/ Casi Aslin

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1<sup>st</sup> day of October, 2021.

#### <u>/s/ Casi Aslin</u>