

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

In the Matter of Missouri-American Water)
Company’s Application for a Certificate of)
Convenience and Necessity Authorizing it to) **File No.: WA-2022-0229**
Install, Own, Acquire, Construct, Operate,)
Control, Manage and Maintain a Water)
System and Sewer System in an area of Pettis)
County, Missouri (Monsees Lake Estates)
Subdivision))

**MOTION FOR EXTENSION OF TIME
TO FILE STAFF RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”) and for its *Motion for Extension of Time to File Staff Recommendation*, states as follows:

1. On February 25, 2022, Missouri-American Water Company (hereafter “MAWC” or “the Company”) filed an application requesting a Certificate of Convenience and Necessity (CCN) to install, own, acquire, construct, operate, control, manage, and maintain a water system (WA-2022-0229) and sewer system (SA-2022-0230) in Pettis County, Missouri in a subdivision known as Monsees Lake Estates Subdivision (“Monsees”).

2. On March 1, 2022, the Commission issued an *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation*; in its Order, the Commission directed Staff to file a recommendation regarding the Company’s application no later than April 25, 2022.

3. Subsequently, the Commission granted the Company’s Motion to Consolidate on March 14, 2022. On April 8, 2022, the Commission also granted the Company’s Motion to Amend its Application and allow MAWC to replace and amend

Appendix C and Appendix D to its Application. The Application was so amended without objection.

4. Staff has and will continue to issue data requests to aid in its review, provide feedback, and continue discussions with MAWC. However, MAWC's responses to Staff's initial rounds of data requests have spurred the need for further investigation and additional discovery.

5. Further, as is common practice in cases regarding the acquisition of existing water and sewer systems, Staff requested and recently received certain historical information related to the operation of the wastewater systems from the Missouri Department of Natural Resources ("DNR"). Staff requests additional time to review DNR's information and determine if further information is needed from DNR and/or MAWC as a result.

6. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from MAWC and DNR, and complete its investigation, Staff requests an additional 45 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for MAWC and the Office of the Public Counsel have been contacted regarding this motion and neither party object to the granting of an extension of time in this matter.

8. This motion is made in the interest of justice and not with the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and hereby prays the Commission order Staff to file its recommendation in this matter an additional 45 days; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 25th day of April, 2022, to all counsel of record.

/s/ Carolyn H. Kerr