

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

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) **File No. WM-2020-0403**
and Sewer Assets of Terre Du Lac Utilities)
Corporation)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Status Report*, states as follows:

1. On June 12, 2020, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) filed its *Application and Motion for Waiver*, seeking authority to acquire substantially all of the water and/or sewer assets of Terre Du Lac Utilities Corporation (“Terre Du Lac”) and approval of the transfer of Terre Du Lac’s existing certificates of convenience and necessity (“CCNs”), or for the Commission to grant new CCNs authorizing Confluence Rivers to own, install, construct, operate, control, manage and maintain the systems it proposed to acquire. Confluence Rivers also seeks a rate of return premium and debt acquisition adjustment under Commission Rule 20 CSR 4240-10.085(1)(C), and a waiver of the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1).

2. On July 7, 2020, Staff filed its *Status Report*, indicating when it would be able to file a recommendation. That same day, the Commission issued its *Order Directing Filing*, ordering Staff to file its recommendation no later than August 21, 2020.

3. In the course of its review, Staff has submitted multiple data requests (“DRs”) to both Confluence Rivers and Terre Du Lac. However, various responses to Staff data requests (DRs) have given rise to additional follow up questions.

Staff issued five (5) additional DRs to both Confluence Rivers and Terre Du Lac on August 6, 2020, responses to which are not due until August 26, 2020, and are necessary for Staff to finalize its recommendation.

4. Therefore, Staff requests a four week extension, until September 18, 2020, in which to file its recommendation.

WHEREFORE, Staff prays the Commission grant its *Motion for Extension*; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 14th day of August, 2020.

/s/ Mark Johnson