

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

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| In the Matter of Missouri-American |) | |
| Water Company for Certificates of |) | |
| Convenience and Necessity Authorizing |) | |
| it to Install, Own, Acquire, Construct, |) | File No. WA-2019-0364 |
| Operate, Control, Manage and Maintain |) | SA-2019-0365 |
| a Water System and a Sewer System in |) | |
| an area of Miller County, Missouri (Isla |) | |
| del Sol Condominium Association, Inc., |) | |
| f/k/a Atlantis Island). | | |

RESPONSE TO STAFF MOTION FOR ADDITIONAL TIME

COMES NOW Missouri-American Water Company (MAWC) and, in response to the *Motion for Additional Time to October 11, 2019 to File Staff Recommendation*, states as follows to the Missouri Public Service Commission (Commission):

1. On May 26, 2019, MAWC filed an Application with the Commission for certificates of convenience and necessity related to an existing Water System and a Sewer System in an area of Miller County, Missouri (Isla del Sol Condominium Association, Inc., f/k/a Atlantis Island). If the application is granted, MAWC will have one customer for each system – the local homeowners association.

2. Staff filed its *Motion for Additional Time to October 11, 2019 to File Staff Recommendation* on August 14, 2019. The extension requested by Staff is for approximately 60 days. It is premised on an unknown – “. . . should MAWC fail to provide sufficient information, Staff believes it will need to conduct its own analysis to obtain estimated book values. . . . Staff estimates that 60 days is required to complete this and prepare its recommendation.”

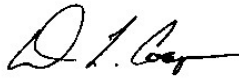
3. An automatic 60 day extension creates difficulties from MAWC’s perspective. First, the seller desires to move forward with this transaction as soon as possible. The perception associated with a 60-day extension will be that the recommendation will not be filed for 60 days

(in spite of Staff's indication that it will try to move more quickly) and that a closing may not be possible until December. Such a result could impact the transaction. Additionally, a December closing means that the operational work necessary for MAWC to take over the system would also happen in December. December is a difficult time for this work both for weather and personnel availability reasons.

4. Given that the Staff's 60-day extension request is based on an unknown. (Motion, para. 10), MAWC believes that it would be more appropriate to initially provide for a 30-day extension. If the Commission so limits the extension to 30 days at time, Staff can always move for the additional time when it knows whether it will need the additional time.

WHEREFORE, MAWC hereby responds to the Motion for Additional Time and asks that the Commission limit the Staff's extension to 30 days, until more information is known.

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 15th day of August, 2019, to:

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