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

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).		

## MOTION TO FOR LEAVE TO AMEND APPLICATION

**COMES NOW** Missouri-American Water Company (MAWC) and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

- 1. On May 26, 2019, MAWC has filed an Application with the Commission for certificates of convenience and necessity related to 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).
- 2. Among other things, attached to that Application was an Appendix C-C, which was represented to be a feasibility study for the water and sewer systems, including estimated expenses and revenues during the first three years of operation by MAWC. After further review, it appears that the information contained in that feasibility study was from a similar, but different, water and sewer system.
- 3. Accordingly, MAWC seeks the Commission's leave to amend the Application by replacing **Appendix C-C** to the Application with the **Appendix C-C REVISED** attached to this pleading. **Appendix C-C REVISED** has been identified as Confidential in accordance with

Commission Rule 4 CSR 240-2.135(2)(A)4 and 6, as it contains market specific information and information representing strategies employed in contract negotiations.

4. Commission Rule 4 CSR 240-2.080(18) provides, in part, that a pleading may be amended at any time by leave of the Commission. No responsive pleading has yet been filed in this matter. Staff has been ordered to file a recommendation by August 16, 2019. MAWC believes that a grant of the requested leave will not prejudice the parties and will further the public interest by amending the application to provide accurate information.

**WHEREFORE**, MAWC requests a Commission issue its order granting MAWC leave to amend its Application as described 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  $8^{th}$  day of July, 2019, to:

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