

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

In the Matter of the Application of)	
Old National Bank for Authority to)	<u>File No. WM-2012-0314</u>
Seize the Assets of Tri-States Utility, Inc.)	

REQUEST FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and hereby submits to the Missouri Public Service Commission ("Commission") its *Request for Extension*, stating the following in support thereof:

1. On March 21, 2012, Old National Bank ("Old National") filed with the Commission an *Application*, requesting authority to sell, transfer, and/or otherwise dispose of the property of Tri-States Utility, Inc. ("Tri-States").

2. On March 21, 2012, the Commission entered an *Order Directing Filings*, which directed Tri-States to file a response by April 20, 2012, Staff to file a recommendation April 27, 2012, and any party to file a reply to Staff's recommendation no later than May 9, 2012.

3. After three motions for extension by Tri-States, the Commission entered an *Order Extending Time for Filing*, which directed Tri-States to file a response by July 6, 2012, Staff to file a recommendation by August 6, 2012, and any party to file a reply to Staff's recommendation no later than August 23, 2012.

4. On July 6, 2102, Tri-States filed its *Response of Tri-States Utility, Inc. In Opposition To Application*.

5. Staff has been in communication with both Tri-States and Old National and has been informed that those parties are working towards a settlement. Staff understands that it will be given the opportunity to review any such settlement.

However, Staff is continuing its investigation and has submitted several outstanding Data Requests that need to be answered and reviewed. Therefore, Staff is requesting an extension of time until September 7, 2012, to file its recommendation or other appropriate responsive pleading.

6. Counsel for Tri-States, Old National, and the Office of the Public Counsel have represented to Staff that they have no objection to this request for extension of time. If such an extension is granted, the parties request that they be given until September 24, 2012, to file their reply to Staff's recommendation or other appropriate responsive pleading.

7. This request is not meant to unduly delay the process and will not prejudice any party to this proceeding.

WHEREFORE, Staff respectfully requests an extension of time to file its recommendation or other appropriate responsive pleading until September 7, 2012. If such extension is granted, Staff request the parties be given until September 24, 2012, to file their reply to Staff's recommendation or other appropriate responsive pleading.

Respectfully submitted,

/s/ Amy E. Moore

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 6th day of August, 2012.

/s/ Amy E. Moore