

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

In the Matter of the Application of Liberty )  
Utilities (Missouri Water), LLC d/b/a Liberty )  
Utilities to Acquire the Water and Sewer ) **File No. WM-2020-0174**  
Franchises and Assets of Lakeland )  
Heights Water Company, Oakbrier Water )  
Company, R.D. Sewer Company LLC, and )  
Whispering Hills Water System )

**MOTION FOR FURTHER EXTENSION**

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

1. On February 6, 2020, Liberty Utilities (Missouri Water) LLC d/b/a Liberty Utilities (“Liberty Water”), filed an *Application* with the Missouri Public Service Commission (“Commission”) requesting the Commission approve its acquisition of the water and sewer franchises and assets of Lakeland Heights Water Company, Oakbrier Water Company, R.D. Sewer Company LLC, and Whispering Hills Water System (“Selling Utilities”).

2. On March 30, 2020, the Commission issued its *Order Granting Extension of Time*, granting Staff’s March 24, 2020, *Motion for Extension*, and directing Staff to submit its recommendation no later than May 25, 2020.

3. Since that time, Staff has completed its inspections of the selling systems, but requires additional time in which to finalize its recommendation. Therefore, Staff requests a further extension of ten (10) days in which to do so.

4. Counsel for Staff has discussed with counsel for Liberty Water and the Office of the Public Counsel, and each has indicated their client does not oppose Staff’s request.

**WHEREFORE**, Staff respectfully submits this *Motion for Further Extension* for the Commission's information and consideration and hereby requests the Commission approve Staff's request for a ten (10) day extension, and order Staff to file its Recommendation no later than June 4, 2020.

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 21<sup>st</sup> day of May 2020.

**/s/ Mark Johnson**