

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

In the Matter of the Application of	)	
Elm Hills Utility Operating Company, Inc.,	)	<b><u>File No. WA-2019-0235</u></b>
For a Certificate of Convenience and Necessity	)	

**JOINT MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION**

**COME NOW** Staff of the Missouri Public Service Commission (“Staff”) and Elm Hills Utility Operating Company, Inc. (“Elm Hills,” collectively, “Movants”) and request that the Commission grant Staff an extension of time to May 20, 2019 to file its recommendation regarding Elm Hills’ application for a Certificate of Convenience and Necessity (“CCN”). In support Movants state as follows:

1. On February 12, 2019, Elm Hills filed an application requesting the Commission grant it a CCN to acquire, own, install, construct, operate, control, manage, and maintain water and sewer systems in Pettis County, Missouri, in an area known as Stone Creek, near or within the City of Sedalia.

2. On February 13, the Commission issued its *Order Directing Notice and Setting Dates for Submission of Intervention Requests and Staff Recommendation* directing Staff to file a recommendation regarding the application no later than April 15, 2019.

3. On April 3, 2019 the City of Sedalia applied to intervene in this matter, filed out of time. The City of Sedalia stated that the service area for which Elm Hills seeks a CCN is within Sedalia’s city limits.

4. Since Elm Hills filed its application, Staff and Elm Hills had a productive technical discussion and engaged in discovery to answer questions and issues raised by

the application. Additionally, Elm Hills and the City of Sedalia are in discussion concerning the application.

5. Staff and Elm Hills agree more time is needed to engage in additional discussions and complete discovery prior to Staff filing its recommendation. Accordingly Staff and Elm Hills agree to request an extension of time to May 20, 2019 for the filing of Staff's recommendation.

**WHEREFORE**, Movants respectfully request that the Commission grant Staff an extension of time to file its recommendation no later than May 20, 2019.

Respectfully submitted,

**/s/ Karen E. Bretz**

Karen E. Bretz  
Senior Counsel  
Missouri Bar No. 70632  
Attorney for the Staff of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-751-5472 (Voice)  
573-751-9285 (Fax)  
[Karen.Bretz@psc.mo.gov](mailto:Karen.Bretz@psc.mo.gov)

**/s/ L. Russell Mitten**

L. Russell Mitten  
Missouri Bar No. 27881  
BRYDON, SWEARENGEN &  
ENGLAND, P.C.  
312 E. Capitol Ave.  
P.O. Box 456  
Jefferson City, MO 65102  
573-635-7166 (Voice)  
573-635-3847 (Fax)  
[rmitten@brydonlaw.com](mailto:rmitten@brydonlaw.com)

**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 10th day of April, 2019.

**/s/ Karen E. Bretz**