

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

In the Matter of the Application of Missouri- )  
American Water Company for a Certificate )  
Convenience and Necessity Authorizing )  
it to Install, Own, Acquire, Construct, )  
Operate, Control, Manage, and Maintain a )  
Water System and Sewer System in and )  
around the City of Purcell, Missouri. )

**File No. WA-2022-0293**

**MOTION FOR AN ENLARGEMENT OF TIME  
TO FILE STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its Motion for an Enlargement of Time to File Staff Recommendation, states the following:

1. On April 21, 2022, Missouri-American Water Company (MAWC) filed applications requesting the Commission grant MAWC Certificates of Convenience and Necessity (CCNs) to acquire, own, install, construct, operate, control, manage and maintain water and sewer systems in Jasper County, Missouri. The requested CCNs would allow MAWC to acquire the water and sewer assets of the City of Purcell. The application also requests a variance of the 60-day notice requirement contained in Commission Rule 20 CSR 4240-4.017(1), and a request for expedited treatment of its applications.

2. Also on April 21, 2022, MAWC filed a motion to consolidate the water and sewer CCN applications.

3. Further, on April 22, 2022, the Commission issued its order giving notice, setting an intervention deadline, and directing its Staff (Staff) to file a pleading indicating

when it could file a recommendation. On April 27, 2022, Staff informed the Commission it could file a recommendation by June 28, 2022.

4. Finally, on May 6, Staff requested a copy of the MAWC and Alba well agreement. The drinking water system MAWC is purchasing includes a 50% interest in a well shared with the City of Alba. This extension is necessary to allow MAWC more time to obtain the legal documentation regarding the shared provision of service. In addition to being an unusual situation for a PSC regulated utility, this documentation is important for MAWC to provide service and maintain the well.

5. MAWC confirmed on May 26 that it has a copy of the well agreement and will deliver it to the staff. Staff currently does not possess a copy of the well agreement. The well agreement is essential for discussions about MAWC's ability to perform maintenance and document MAWC's legal authority to operate the well. The undersigned counsel has reached out to counsel for MAWC about the status of the well agreement. Before making a recommendation to the Commission, Staff must obtain the well agreement.

6. For these reasons, Staff requests an additional 30 days to submit its recommendation. Staff will file its recommendation earlier, if possible.

**WHEREFORE**, Staff respectfully requests an extension until July 28, 2022 to file a recommendation.

Respectfully submitted,

**/s/ Eric Vandergriff**

Eric Vandergriff

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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 electronically mailed to all counsel of record on this 28<sup>th</sup> day of June, 2022.

**/s/ Eric Vandergriff**