

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

In the Matter of the Application of Confluence)
Rivers Utility Operating Company, Inc., for a)
Certificate of Convenience and Necessity and) **File No. WA-2023-0003**
Associated with the Acquisition of Certain)
Water Assets)

MOTION FOR EXTENSION

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

1. On July 1, 2022, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) filed an application seeking permission and approval for the acquisition of, and a certificate of convenience and necessity (“CCN”) to install, own, acquire, construct, operate, control, manage and maintain a water system in Camden County (“Application”).

2. On July 6, 2022, the Commission issued its *Order Directing Notice, Setting Deadlines for Intervention Requests, and Directing Staff Recommendation* ordering Staff to either file a recommendation concerning the Application or a request for additional time on or before August 23, 2022. On the same day, Confluence Rivers filed its *Amendment to Application*. Also on July 6, 2022, the Commission issued its *Corrected Order Directing Notice, Setting Deadlines for Intervention Requests, and Directing Staff Recommendation* which recognizes Confluence Rivers *Amendment to Application*.

3. Staff issued several data requests (“DRs”) including several with a due date of August 31, 2022. In order to properly analyze the information and, if necessary,

conduct additional discovery, Staff respectfully requests an extension to file its Recommendation on or before October 24, 2022.

WHEREFORE, Staff prays that the Commission will grant this *Motion for Extension*, and order Staff to file its Recommendation no later than October 24, 2022, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

Ron Irving
Senior Counsel
Missouri Bar No. 56147
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-526-4612(Voice)
ron.irving@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record on this 19th day of August, 2022.

/s/ Ron Irving