BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Hickory)	
Hills Water & Sewer Co., Inc., the Staff of)	
the Missouri Public Service Commission)	
and the Office of the Public Counsel for)	
Approval of Their Unanimous Stipulation)	Case No. WO-2007-0036
and Consent Order for Appointment of)	Case No. WO-2007-0030
Interim Receiver and Order to General)	
Counsel to Petition the Circuit Court of)	
Cole County for Appointment of a)	
Receiver.)	

REQUEST FOR EXTENSION OF TIME TO FILE A PROPOSED COMPENSATION AGREEMENT FOR THE SERVICES OF THE INTERIM RECEIVER

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Request for an Extension of Time to File a Proposed Compensation Agreement for the Services of the Interim Receiver respectfully states as follows:

- 1. On August 3, 2006, the Missouri Public Service Commission (Commission) issued its Order Approving Unanimous Stipulation and Consent Order. This Order approved the Unanimous Stipulation and Consent Order for Appointment of Interim Receiver and Order to General Counsel to Petition the Circuit Court of Cole County for the Appointment of a Receiver filed by Staff, the Office of Public Counsel, and Hickory Hills Water and Sewer Company, Inc. (Hickory Hills) on July 25, 2006.
- 2. The Commission's Order of August 3, 2006 appointed Gary Cover of Clinton, Missouri as interim receiver for Hickory Hills Water & Sewer Co., Inc.
- 3. The Commission's Order of August 3, 2006 directed Staff to file a proposed compensation agreement for Mr. Cover's services as interim receiver on or before August 18, 2006.

4. Staff met with Randy and Kay Clifford and Mr. Cover on August 4, 2006 to discuss the transfer of duties from the Cliffords to Mr. Cover and to discuss finding an operator to run the facility during the receivership. Compensation for Mr. Cover was briefly discussed during this meeting, but it was agreed that finding an operator and transferring responsibility from the Cliffords as soon as practicable took precedence over the compensation issue.

5. Since that meeting, Mr. Cover has begun to perform his duties as receiver, including attempting to obtain bids from operators and communicating with the customers of Hickory Hills by letter to inform them that the receivership commenced effective August 13, 2006.

6. Mr. Cover has been on vacation the week of August 14-18 and has therefore been unavailable to discuss a proposed compensation agreement. Staff requests that additional time be granted to allow time for Staff and Mr. Cover to come to a proposed agreement regarding compensation.

WHEREFORE, Staff respectfully requests that the deadline to submit a proposed compensation agreement be extended to August 25, 2006.

Respectfully submitted,

/s/ Peggy A. Whipple Peggy A. Whipple Chief Litigation Counsel Missouri Bar No. 54758

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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 of record this 18th day of August 2006.

/s/ Peggy A. Whipple