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 and 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 and Staff are still actively searching for an operator for the system. One of the proposed operators has declined to submit a bid. Bids from two other potential operators are expected in the near future. Until an operator's bid has been accepted and the operation costs are known, Staff cannot submit an accurate proposed compensation agreement.

WHEREFORE, Staff respectfully requests that the Commission allow Staff to file a follow-up status report no later than Monday, October 2, 2006 and on the first of each month thereafter until an operator is found. Staff will inform the Commission as soon as an operator's bid has been accepted and a compensation agreement has been reached.

Respectfully submitted,

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

Attorney for the Staff of the Missouri Public Service Commission PO Box 360
Jefferson City, MO 65102
(573) 526-6715 (Telephone)
(573) 526-6969 (Fax)
peggy.whipple@psc.mo.gov

/s/ Jennifer Heintz

Jennifer Heintz Assistant General Counsel Missouri Bar No. 57128

Attorney for the Staff of the Missouri Public Service Commission PO Box 360
Jefferson City, MO 65102
(573) 751-8701 (Telephone)
(573) 751-9285 (Fax)
jennifer.heintz@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 parties of record this 31st day of August 2006.

/s/ Peggy A. Whipple