

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

In the Matter of the City of Chillicothe,	)	
Missouri, and Public Water Supply	)	<b><u>Case No. WO-2013-0193</u></b>
District No. 2 of Livingston, Missouri	)	

**STAFF'S STATUS REPORT AND  
REQUEST FOR EXTENSION OF TIME TO FILE RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and submits to the Missouri Public Service Commission (Commission) the following *Status Report and Request for Extension of Time to File Recommendation (Request)*:

1. On October 16, 2012, the City of Chillicothe, Missouri and Public Water Supply District No. 2 of Livingston County, Missouri (collectively hereafter referred to as Applicants) filed an *Application for Approval of Joint Service Agreement (Application)* with the Commission.

2. On October 18, 2012, the Commission issued an *Order Directing Notice*, allowing any party to intervene by November 7, 2012. No party sought to intervene in this matter.

3. On November 13, 2012, the Commission issued an *Order Directing Staff to File a Status Report* directing Staff to file a recommendation no later than November 20, 2012.

4. During its review, Staff raised some concern with the *Application* and is attempting to resolve those concerns by discussing them with the Applicants. Staff anticipates that any such concern may be alleviated by additional discussions with the Applicants or through formal discovery with the Applicants, and Staff asserts that more

time is needed for additional discussions or discovery in order to obtain the appropriate information on which to base any recommendation.

5. While it may be possible for these concerns to be alleviated quickly, with the schedules of those involved, including other court matters and the upcoming holiday, Staff hereby requests an extension of time for thirty (30) days, until December 21, 2012, to file a recommendation or other appropriate filing with the Commission.

6. According to Section 247.172.4 RSMo, the Commission shall rule on any such *Application* within one hundred twenty (120) days after the application is properly filed with the secretary of the commission. Therefore, the Commission should have adequate time to make a determination even if Staff files its recommendation on December 21, 2012, assuming the filing was proper.

7. Staff does not intend to unduly delay the proceeding with this request.

8. Staff notified the Applicants' counsels of its intention to make this filing and did not receive any objection to such a filing.

**WHEREFORE**, Staff respectfully submits this *Request* for the Commission's information and consideration and respectfully requests until December 21, 2012 to file its recommendation or other appropriate filing with the Commission and any other relief the Commission deems just.

Respectfully submitted,

**/s/ Rachel M. Lewis**

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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 by electronic mail to all counsel of record on this 20<sup>th</sup> day of November, 2012.

**/s/ Rachel M. Lewis**