

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

In the Matter of the Application of Confluence )  
Rivers Utility Operating Company, Inc., for )  
Certificates of Convenience and Necessity to ) **File No. WA-2023-0398**  
Provide Water and Sewer Service in an Area of )  
Lincoln County, Missouri (Quail Run) )

**STAFF’S MOTION FOR EXTENSION**

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

1. On May 24, 2023, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), filed for certificates of convenience and necessity and concerning the acquisition of all or substantially all of the water and sewer system assets of the currently unregulated systems of Lincoln County Water and Sewer, LLC. Confluence Rivers also requested a waiver of the 60-day notice requirements of 20 CSR 4240-4.017.

2. On May 25, 2023, the Commission ordered Staff to file a recommendation regarding the application by July 12, 2023.

3. Staff requests an additional 62 days for discovery and to complete its analysis. The purpose of this request is not to cause undue delay or inconvenience to the parties or the Commission. Therefore, Staff requests the Commission order Staff’s recommendation to be due by September 12, 2023.

4. The undersigned counsel emailed Confluence River’s counsel asking whether they objected to this request. These counsel stated that they do not oppose this request.

**WHEREFORE,** Staff respectfully requests until September 12, 2023, to file a recommendation.

Respectfully submitted,

**/s/ Eric Vandergriff**

Eric Vandergriff

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Staff Counsel for the

Missouri Public Service Commission

### **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 parties and/or counsel of record on this 11<sup>th</sup> day of July, 2023.

**/s/ Eric Vandergriff**