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September 16, 2005

FILED²
SEP 16 2005
Missouri Public
Service Commission

The Honorable Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. WC-2006-0082

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter the original and five copies of a Motion for Extension of Time to File Response.


Would you please bring this filing to the attention of the appropriate Commission personnel.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
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MWC:ab

Enclosure

cc: Office of Public Counsel
General Counsel's Office
Cathy Orler
Reginald V. Golden

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

SEP 16 2005

Missouri Public
Service Commission

Cathy J. Orler,)	
)	
Complainant,)	
v.)	Case No. WC-2006-0082
)	
Folsom Ridge, LLC (Owning and)	
Controlling the Big Island)	
Homeowners' Association),)	
)	
Respondent.)	

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

COMES NOW Folsom Ridge, LLC (Folsom Ridge or Company) and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to file an answer or other response to the complaint. In support thereof, Folsom Ridge submits the following:

1. In its Notice of Complaint dated August 19, 2005, the Commission directed that an answer or other response be filed by Respondent on or before September 19, 2005 which is within thirty days of the date of the notice.

2. As the Commission's records will reflect, Folsom Ridge is also named as the respondent in a complaint entitled *Benjamin D. Pugh v. Folsom Ridge, LLC*, Case No. WC-2006-0090 ("the Pugh complaint"). An answer or other response is due on or about September 29, 2005 in the Pugh complaint. The Pugh complaint and the instant one both involve the same or a similar set of facts and circumstances about water system operations on Big Island at the Lake of the Ozarks.

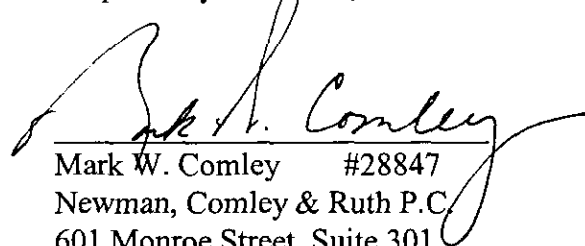
3. Folsom Ridge needs additional time to answer this complaint. Due to the similarity of the complaints against it, Folsom Ridge is presently determining how to respond to both including consideration of a request for consolidation for all purposes. Folsom Ridge also needs additional time to weigh whether it should suggest voluntary mediation for both complaints.

4. Folsom Ridge requests additional time, up to and including September 29, 2005, to file an answer in this matter; the same date Folsom Ridge intends to file its answer or other response to the Pugh complaint.

5. The extension sought will not prejudice any party to the action and will not unfairly delay the disposition of this cause but rather will serve the interests of fairness and the efficiency of the Commission's administration of the complaint processes.

WHEREFORE, Folsom Ridge respectfully requests the Commission to issue an Order extending the time within which it files its answer, up to and including September 29, 2005.

Respectfully submitted,



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Attorneys for Folsom Ridge, LLC

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 16th day of September, 2005, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov; and via U.S. Mail, postage prepaid, to Cathy Orler, 3252 Big Island Drive, Roach, MO 65787.

