

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

In the Matter of the Joint Application of)
Brandco Investments, LLC and Hillcrest)
Utility Operating Company, Inc., for Hillcrest)
to Acquire Certain Water and Sewer Assets)
of Brandco and, In Connection Therewith,)
Issue Indebtedness and Encumber Assets)

File No. WO-2014-0340

**MOTION FOR EXTENSION OF TIME TO FILE STAFF'S REPORT AND REQUEST
FOR LOCAL PUBLIC HEARING**

COMES NOW Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and files this *Motion for Extension of Time to File Staff's Report and Request for Local Public Hearing*, respectfully requesting the Missouri Public Service Commission grant its *Motion* extending the date for filing Staff's Reports in this proceeding from August 5, 2014 to August 19, 2014¹. In support of this motion, Staff states as follows:

1. On May 13, Applicants, Brandco Investments, LLC ("Brandco") and Hillcrest Utility Operating Company, Inc., ("Hillcrest") filed their *Joint Application and, If Necessary, Motion for Waiver*. Applicants requested that the Commission approve Hillcrest's agreement to purchase Brandco's water and sewer assets. Hillcrest would partially finance the purchase via debt that would encumber those assets, and also asks the Commission to approve the same. Finally, Hillcrest wishes to become regulated by the Commission, and, thus, also wishes for the Commission to grant it a certificate of convenience and necessity to own and operate those water and sewer assets.

¹ All dates referenced are 2014 unless otherwise stated.

2. On June 5, the Commission issued its *Order Directing Filing* directing Staff to file its recommendation, or in the alternative a status report no later than July 7.

3. On July 7, Staff filed its Status Report and Motion for Consolidation requesting Staff have until August 5 to file its recommendation, or in the alternative a status report. The Commission granted Staff's request on July 17.

4. Staff continues its investigation related to this application; however, due to the unique nature of the financial transaction and the need for significant capital investment in both the water and sewer system Staff is in the process of including a preliminary rate feasibility study into its recommendation and requires more time to complete its recommendation. Staff requests until August 19 to file its recommendation.

5. Because of existing quality of service issues, a need for significant future upgrades to utility plant, and a likely corresponding need for future rate increases, Staff requests the Commission schedule a local public hearing in the affected service area to give ratepayers an opportunity to voice any concerns they may have regarding the potential transfer.

6. Staff has contacted the parties in the case, and they do not object to Staff's Motion.

WHEREFORE, Staff files this *Motion for Extension of Time to File Staff's Report and Request for Local Public Hearing* and requests the Commission grant its *Motion and Request for Local Public Hearing*.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served to all counsel of record by hand delivery, electronic mail or First Class United States Mail this 4th day of August 2014.

/s/ Alexander Antal