

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

Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	
v.)	<u>Case No. WC-2014-0018</u>
)	
Consolidated Public Water Supply District)	
C-1 of Jefferson County, Missouri,)	
)	
and)	
)	
City of Pevely, Missouri,)	
)	
Respondents.)	

MOTION FOR EXTENSION OF TIME

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

1. Staff filed its *Complaint* on July 19, 2013, asserting that the Respondents had in 2007 entered into a territorial agreement without seeking its approval by this Commission, in violation of § 247.172, RSMo.¹

2. On March 28, 2014, Staff filed its *Motion for Summary Determination* with supporting *Suggestions* and *Staff's Reply to Respondents' Denominated Affirmative Defenses in Support of its Motion for Summary Determination*.

3. On April 25, 2014, Respondents timely-filed their *Answers and Objections to Staff's Motion for Summary Determination*, their *Suggestions in Opposition to Staff's*

¹ All statutory references, unless otherwise specified, are to the Revised Statutes of Missouri (“RSMo”), revision of 2000, as amended and cumulatively supplemented.

Motion for Summary Determination, and their *Responses to Staff's Reply to Respondents' Denominated Affirmative Defenses*.

4. Pursuant to Commission Rule 4 CSR 240-2.080(13), "Parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission." The Commission has not ordered Staff to reply to Respondents' responses by any particular date and so Staff's reply is due by Monday, May 5, 2014, the tenth day following April 25, 2014.

5. Due to the press of other business, Staff is unable to reply earlier than Wednesday, May 7, 2014.

6. Staff has consulted with counsel for each Respondent herein, as well as counsel for the Office of the Public Counsel, and none of them have any objection to this motion.

WHEREFORE, Staff prays that the Commission will grant it an extension of time to reply to the *Responses*, etc. of Respondents to its *Motion for Summary Determination* herein, up to and including Wednesday, May 7, 2014; and such other and further relief as the Commission deems just.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **2nd day of May, 2014**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Kevin A. Thompson