

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

In the Matter of the Application of)	
Elm Hills Utility Operating Company, Inc.,)	<u>File Nos. WA-2019-0235</u>
for a Certificate of Convenience and Necessity)	and SA-2019-0236

**JOINT MOTION FOR FURTHER EXTENSION OF TIME TO FILE
RECOMMENDATION**

Under authority of and in accordance with 4 CSR 240-2.080, Elm Hills Utility Operating Company, Inc. ("Elm Hills"), the Missouri Public Service Commission Staff ("Staff"), and the City of Sedalia, Missouri ("City") (collectively, "Movants") jointly request the Commission issue an order further extending – to June 20, 2019 – the date for Staff to file its recommendation regarding Elm Hills' application for a Certificate of Convenience and Necessity ("CCN"). In support of their request, Movants state:

1. On February 12, 2019, Elm Hills filed an application requesting the Commission grant it a CCN to acquire, own, install, construct, operate, control, manage, and maintain water and sewer systems in Pettis County, Missouri, in an area known as Stone Creek.

2. On February 13, the Commission issued its *Order Directing Notice and Setting Dates for Submission of Intervention Requests and Staff Recommendation* directing Staff to file a recommendation regarding the application no later than April 15, 2019.

3. On April 3, 2019, the City of Sedalia applied to intervene in this matter. That application stated, *inter alia*, the service area for which Elm Hills seeks a CCN is within City's corporate limits.

4. Since it filed its application, Elm Hills and Staff have had a productive technical discussion and engaged in discovery to answer questions and issues raised by the application. Additionally, Elm Hills and City are in discussions concerning what effect, if any, the fact the subject service area is within City's corporate limits will have on Elm Hills' desire to pursue its application.

5. Movants agree more time is needed to engage in additional discussions and complete discovery prior to Staff filing its recommendation. Accordingly, Movants have agreed to request the date for filing Staff's recommendation be extended to June 20, 2019.

WHEREFORE, for the reasons previously stated, Movants respectfully request the Commission grant the requested extension and order Staff to file its recommendations no later than June 20, 2019.

Respectfully submitted,

/s/ Karen E. Bretz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 26th day of April, 2019.

/s/ L. Russell Mitten