# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company	)	
for a Certificate of Convenience and Necessity	)	
Authorizing it to Install, Own, Acquire, Construct,	)	Case No. WA-2012-0066
Operate, Control, Manage, and Maintain Water and	)	Case No. SA-2012-0067
Sewer Systems in Christian and Taney Counties,	)	
Missouri.	)	

# STAFF'S MOTION FOR EXTENSION OF TIME

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and files this *Motion for Extension of Time* with the Missouri Public Service Commission (Commission), respectfully stating the following:

- 1. On August 26, 2011, Missouri-American Water Company (MAWC) filed two *Applications* with the Commission, seeking a Certificate of Convenience and Necessity for the authority to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems in an incorporated village of Christian and Taney Counties, Missouri (jointly referred to as "Applications"). These *Applications* were given Commission Case Nos. WA-2012-0066 and SA-2012-0067. On October 17, 2011, Case Nos. WA-2012-0066 and SA-2012-0067 were consolidated with the primary case being Case No. WA-2012-0066.
- 2. On September 9, 2011, the Commission issued an *Order Directing Notice and Setting Date for Submission of Intervention Requests*, ordering that notice of MAWC's Applications be served to interested parties and setting an intervention deadline of September 29, 2011. No parties intervened in this case.
- 3. On October 3, 2011, the Commission issued an *Order Directing Filing*, directing Staff to file a status report or a recommendation regarding MAWC's applications no later than November 2, 2011.

4. On October 27, 2011, Staff filed a *Status Report* stating that it hoped to conclude its investigation and file a Staff Recommendation on or before November 30, 2011. Staff has experienced some difficulty in determining values to include in its recommendation because of the lack of available information regarding the water and sewer system, and therefore seeks additional time, until December 20, 2011, to finalize its Recommendation in this matter.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time* for the Commission's information and consideration and hereby requests the Commission issue an Order granting Staff until December 20, 2011 to file a Staff Recommendation in this matter.

Respectfully submitted,

## /S/ RACHEL M. LEWIS

Rachel M. Lewis MO Bar #56073 Goldie Tompkins MO Bar #58759

Attorneys for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 526.6715 (Telephone)
(573) 751-9285 (Fax)
rachel.lewis@psc.mo.gov
goldie.tompkins@psc.mo.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29th day of November, 2011.

#### /S/ RACHEL M. LEWIS