

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

In the Matter of Confluence Rivers Utility	)	
Operating Company, Inc., Request for Authority	)	
to Implement a General Rate Increase for Water	)	File No. WR-2023-0006
Service and Sewer Service Provided in Missouri	)	
Service Areas.	)	

**CONFLUENCE RIVERS’ MOTION FOR EXTENSION OF TIME**

COMES NOW Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), and, as its *Motion for Extension of Time*, states as follows to the Missouri Public Service Commission (“Commission”):

1. On May 11, 2023, the Office of the Public Counsel (“OPC”) filed its *Motion to Compel*. Also on May 11, 2023, the Commission issued an *Order Directing and Shortening Response Times Regarding Motion to Compel* directing that Confluence Rivers provide a response to the *Motion to Compel* by May 17, 2023.

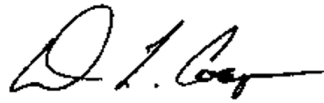
2. OPC’s *Motion to Compel* addresses twenty-one (21) data requests that were discussed at a discovery conference held on April 19, 2023 – approximately three weeks prior to the filing of the *Motion to Compel*. The *Motion to Compel* is lengthy (33 pages) and will require a lengthy response from Confluence Rivers. As indicated above, OPC has waited approximately three weeks after the discovery conference to file its motion and, perhaps most importantly, did not seek expedited treatment.

3. Given these factors, Confluence Rivers requests that the date to respond to the *Motion to Compel* be extended to Monday, May 22, 2023, which would generally match the default period of ten days and provide Confluence Rivers adequate time to respond to the

pending motion.

**WHEREFORE**, Confluence Rivers respectfully requests the Commission consider this *Motion for Extension*, and grant the relief requested herein.

Respectfully submitted,



Dean L. Cooper, Mo. Bar #36592  
**BRYDON, SWEARENGEN & ENGLAND P.C.**  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456  
Telephone: (573) 635-7166  
Facsimile: (573) 635-0427  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

David L. Woodsmall, Mo. Bar #40747  
**CENTRAL STATES WATER RESOURCES**  
1630 Des Peres Rd., Suite 140  
Des Peres, MO 63131  
Telephone : 314-408-4695  
[dwoodsmall@cswrgroup.com](mailto:dwoodsmall@cswrgroup.com)

**ATTORNEYS FOR CONFLUENCE RIVERS  
UTILITY OPERATING COMPANY, INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 15<sup>th</sup> day of May 2023 to all counsel of record.

