

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

In the Matter of Missouri-American Water	)	
Company for Certificates of Convenience and	)	
Necessity Authorizing it to Install, Own, Acquire,	)	<b>Case No. WA-2019-0366</b>
Construct, Operate, Control, Manage and Maintain	)	Consolidated from SA-2019-0367
a Water System and a Sewer System in an area	)	
of Camden County, Missouri (Sunset Palms	)	
Condominium Complex)	)	

**THE OFFICE OF THE PUBLIC COUNSEL’S MOTION FOR  
EXTENSION OF TIME TO COMPLETE DISCOVERY AND TO FILE A  
RESPONSE TO THE STAFF’S RECOMMENDATION IN THIS CASE**

**COMES NOW** the Missouri Office of the Public Counsel and in support of its Motion for Extension of Time to Complete Discovery and file a Response to the Staff’s September 18 *Recommendation* in this matter respectfully states:

1. On May 26, 2019, Missouri American Water Missouri (“MAWC”) filed an Application and Motion for Waivers seeking a certificate of convenience and necessity in these now consolidated cases to buy and maintain the water and sewer systems in an area known as Sunset Palms Condominiums. Attached to the Application are a map and legal description of the property, showing it is located in Camden County Missouri.
2. On May 29, the Commission issued its *Order Directing Notice, Setting Date for Intervention, and Ordering Staff Recommendation*.
3. A number of procedural motions were filed regarding the date on which Staff would file its recommendation, culminating with Staff’s September 18, 2019 filing.
4. As a result of Public Counsel’s reading of the Application and Staff’s recommendation, Public Counsel sent informal questions to MAWC to resolve what Public

Counsel saw as potentially conflicting information.

5. Since a number of Public Counsel's questions involve confidential information, Public Counsel will not be more specific about the nature of its questions.

6. The Company suggested a telephone call to discuss the questions. Due to conflicting schedules, however, the Company and Public Counsel have been unable to schedule any time to discuss these questions.

7. Public Counsel is unable to respond to Staff's Recommendation until it has had the opportunity to obtain MAWC's responses and to review and develop its reply to Staff's recommendation.

8. Since Public Counsel does not know when the exchange of information will occur, Public Counsel is unable to specify a date by which it will be able to respond. Public Counsel, therefore, recommends the Commission grant an extension until October 11, for either a response or a status report informing the Commission on the progress toward resolution of Public Counsel's questions.

9. Public Counsel sent emails asking if either Staff or the Company objected to this request and has received no response.

**WHEREFORE** Public Counsel respectfully requests the Commission issue its order granting Public Counsel's request for an extension of time to complete discovery and respond to the Staff's recommendation in this case.

Respectfully submitted,  
OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or notification of EFIS filing has been sent to all counsel of record this 27<sup>th</sup> day of September, 2019.

/s/ Lera Shemwell