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

In the Matter of I.H. Utilities, Inc., ) Small Company Rate Increase ) File No. WR-2010-0048 Tracking No. YW-2010-0068

## **STAFF'S MOTION TO EXTEND FILING DEADLINE**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Counsel, and for its Motion states:

1. On August 10, 2009, Staff filed its Timeline and Request for Order Approving Timeline in this Cause.

2. On August 14, 2009, the Commission approved Staff's Timeline.

3. On August 19, 2009, the Office of the Public Counsel filed a motion to amend the Timeline.

4. Also on August 19, the Commission entered its Order Granting Amendment of Timeline.

5. The Timeline specifies that Staff submit a "Standard Information Letter" and Related Documents to the EFIS case file on September 20, 2009.

6. A customer comment still under investigation was received after close of business Thursday, September 17, and the type of investigation required prevents Staff from being able to give a finished report on the results of its investigation at this time. Because Staff's investigation of comments received in this cause is still ongoing, Staff is unable to file a complete account of the materials specified in the Timeline at this time.

7. Good cause exists for the granting of this extension, in that Staff is literally completing its investigation and believes filing one complete accounting of the investigation

results rather than one or more incomplete reports is a more efficient use of Commission and Staff resources.

8. The Staff respectfully requests this extension of time to submit the referenced materials until September 25, 2009, to allow time for it to complete its investigations, and Staff to evaluate the information obtained in those investigations.

9. The Staff does not believe that any party will be harmed by the granting of its request for an extension of time to submit the referenced materials. The Staff does not make its request so as to unduly delay these proceedings.

WHEREFORE the Staff requests that the Commission grant it an extension of time from September 21, 2009 to September 25, 2009 for the submission of the "Standard Information Letter" and Related Documents in the instant cause.

Respectfully submitted,

/s/ Sarah Kliethermes Sarah L. Kliethermes Legal Counsel Missouri Bar No. 60024

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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 counsel of record this 21<sup>st</sup> day of September, 2009.

/s/ Sarah Kliethermes