

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

In the Matter of Missouri-American)	
Water Company's Infrastructure)	<u>Case No. WR-2011-0336</u>
System Replacement Surcharge (ISRS))	

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 (Motion)* with the Missouri Public Service Commission (Commission), respectfully stating the following:

1. On June 22, 2011, Missouri-American Water Company (MAWC or Company) filed Petition to Change its Infrastructure System Replacement Surcharge (ISRS) (*Petition*).
2. On June 23, 2011, the Commission issued an *Order Suspending Tariff, Directing Notice and Setting Intervention Deadline*.
3. Applications to intervene were due to be filed no later than July 8, 2011. To date, the only application to intervene was filed by the City of Jefferson, Missouri on July 6, 2011 and withdrawn on July 14, 2011. No other interveners have filed documents with the Commission
4. Section 393.1006.2(2), RSMo (2010) provides that Staff "may examine information of the water corporation to confirm that the underlying costs are in accordance with the provision of sections 393.1000 to 393.1006, and to confirm proper calculation of the proposed charge, and may submit a report regarding its examination not later than sixty days after the petition is filed."
5. Staff's response is currently due August 22, 2011, according to the statute.

6. However, Staff has not yet received actual costs from the Company for June and July 2011, therefore it cannot provide the Commission with an accurate report by the current deadline.

7. In order for Staff to provide a complete analysis, Staff seeks a fifteen (15) day extension, until September 6, 2011, to allow time for Staff to receive and review adequate information from the Company regarding actual costs for June and July 2011.

WHEREFORE, Staff respectfully submits this *Request* for the Commission's consideration and requests that the Commission allow until September 6, 2011, for Staff to file its Response to the *Petition*.

Respectfully submitted,

/s/ Rachel M. Lewis

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Deputy Counsel
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 5th day of August, 2011.

/s/ Rachel M. Lewis

