

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

In the Matter of Rex Deffenderfer Enterprises, Inc.,)
d/b/a RDE Water Company's Request for Increase)
in Annual Water Operating Revenues) **Case No. WR-2016-0267**

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and RDE Water Company (RDE), by and through counsel, and for its *Motion for Extension* in these matters hereby state:

1. On April 11, 2016, RDE filed a letter with the Missouri Public Service Commission (Commission) requesting that the Commission approve increases in its annual water operating revenues

2. On April 18, 2016, Staff submitted its *Small Utility Rate Case Timeline* pursuant to Commission Rule 4 CSR 240-3.050(5). Included in its timeline, Staff identified that the results of its initial audit/investigation would be reported to the utility and the Office of Public Counsel (OPC) on July 11, 2016, in accordance with Commission Rule 4 CSR 240-3.050(9).

3. On June 24, 2016, the Missouri Department of Natural Resources (DNR) issued a report identifying several compliance deficiencies with RDE's operations. Staff notes that DNR's report includes a microbiological analysis and reports its samples to be Total Coliform absent, or "safe". As compliance with DNR's report may affect RDE's request, Staff and RDE seek an extension of thirty (30) days on its 90 Day initial audit/investigation reporting requirement to provide RDE an opportunity to determine

what effect, if any, compliance deficiencies alleged by DNR may have on RDE's request.

4. Commission Rule 4 CSR 240-3.050(12) provides that Staff and the utility may agree to extend certain reporting requirements, including the Day 90 filing, for up to two months.

5. To that end, Staff and RDE request an extension of the Day 90 filing requirement, pursuant to 4 CSR 240-3.050(9), of thirty (30) days, to August 10, 2016, in which to file Staff's initial audit/investigation report to RDE and OPC in accordance with Commission Rules.

WHEREFORE, Staff prays that the Commission will grant this request for an extension to August 10, 2016; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Hampton Williams

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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 electronically mailed to all counsel of record on this 11th day of July, 2016.

/s/ Hampton Williams