BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Water Rate)
Increase Request of)
Hillcrest Utility Operating)
Company, Inc.	
Consolidated with,) Case No. WR-2016-0064
In the Matter of the Sewer Rate)
Increase Request of)
Hillcrest Utility Operating)
Company, Inc.)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and Hillcrest Utility Operating Company, Inc. (Hillcrest), by and through counsel, and for their *Motion for Extension* in these matters hereby state:

- 1. On September 15, 2015, Hillcrest filed a letter with the Missouri Public Service Commission (Commission) requesting that the Commission approve increases in its annual water and sewer operating revenues, which resulted in the Commission opening two cases, Case Nos. WR-2016-0064 and SR-2016-0065. On October 9, 2015, Staff filed a *Motion to Consolidate*, which the Commission granted on October 21, 2015, consolidating both cases under Case No. WR-2016-0064.
- 2. Staff submitted several data requests to Hillcrest and began conducting its audit immediately following the filing of Hillcrest's request. Staff has met with the company to discuss the differences between Hillcrest's and Staff's calculations. Presently an executed disposition agreement is to be filed February 16, 2016, according to Commission Rule 4 CSR 240-3.050(11).

- 3. At this time, Staff intends to have a meeting with Hillcrest to finalize both parties' positions prior to filing a partial or complete disposition agreement. Following that meeting, Staff hopes to have a better understanding of the status of this matter, and will be better able to provide the Commission with either a partial or complete disposition agreement.
- 4. To that end, Staff requests an extension of 10 days, to February 26, 2016, in which to file either a complete or partial disposition agreement in accordance with Commission Rules.

WHEREFORE, Staff prays that the Commission will grant this request for an extension to February 26, 2016; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 11th day of February, 2016, to all counsel of record.

/s/Whitney Payne