

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

In the Matter of Missouri-American Water)
Company for a Certificate of Convenience)
And Necessity Authorizing it to Install,)
Own, Acquire, Construct, Operate,)
Control, Manage and Maintain a Water)
System and Sewer System in and around)
The City of Garden City, Missouri.)

File No. WA-2021-0391

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Motion for Extension*, states as follows:

1. On May 7, 2021, MAWC filed an Application and Motion for Waiver (“Application”) with the Commission, in File Nos. WA-2021-0391 and SA-2021-0392, seeking certificates of convenience and necessity authorizing Missouri-American Water Company (“MAWC”) to acquire and operate the assets of a municipal water and sewer system in Garden City, Missouri.

2. On May 26, 2021, the Commission issued its *Order Directing Notice* and *Order Directing Filing* setting an intervention deadline of May 25, 2021, and directing Staff to file a recommendation regarding MAWC’s Application no later than June 25, 2021, respectively. No applications to intervene were submitted in either File No. WA-2021-0391 or File No. SA-2021-0392

3. On May 28, 2021, MAWC filed its *Motion to for Leave to Amend Application and Amendment to the Application* (“Amendment”), stating that MAWC neglected to address in its Application the issue of rate base, and seeks to amend its Application to include a request, and the necessary corresponding documentation, attached thereto as

Appendix J, to establish rate base associated with the Garden City water and sewer assets in this matter pursuant to Section 393.320, RSMo.

4. On June 7, 2021 Staff filed its response to MAWC's Amendment and stated that while Staff did not oppose MAWC's May 28th Amendment, it was Staff's position that the Amendment constitutes a significant modification to the original Application, and Staff requested that the Commission direct additional notice be given, re-establish a period for interested parties to request intervention in the matter, and set a new filing date by which Staff was to submit its recommendation.

5. On June 8, 2021, the Commission issued its *Additional Order Directing Notice*, directing additional notice be give, setting a new intervention deadline of June 23, 2021, and directing Staff to file its Recommendation or alternative pleading no later than July 8, 2021. Also on June 8, 2021, the Commission issued its *Order Granting Motion to Consolidate*. Since that time, no parties have requested intervention in this matter.

6. While Staff has and will continue to issue data requests to aid in its review, provide feedback, and continue discussions with MAWC, in order to provide sufficient time to conduct further discovery, obtain necessary operational information from DNR, and complete its investigation, Staff requests an additional 90 days in which to complete and file its recommendation. That being said, Staff will aim to complete its review prior to any newly established filing date.

WHEREFORE, Staff respectfully requests the Commission grant its *Motion for Extension* and requests the Commission establish a new filing date of October 6, 2021, by which Staff is to submit its recommendation as stated herein; and grant such other and further relief as the Commission considers reasonable in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 8th day of July, 2021.

/s/ Mark Johnson