

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

In the Matter of Leon Travis Blevins d/b/a)
Misty Water Works Application for a Certificate of)
Convenience and Necessity Authorizing it to) **File No. WA-2023-0418**
Install, Own, Acquire, Construct, Operate,)
Control, Manage and Maintain a Water System)
in an area of Pulaski County, Missouri)

**MOTION FOR EXTENSION OF TIME
TO FILE STAFF RECOMMENDATION**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”),
by and through counsel, and for its *Motion for Extension of Time to File Staff
Recommendation*, states as follows:

1. On June 13, 2023, Leon Travis Blevins d/b/a Misty Water Works filed its
Application for Certificate (“Application”) seeking a Certificate of Convenience and
Necessity (“CCN”) for authority to install, own, acquire, construct, operate, control,
manage, and maintain a water system in an area of Pulaski County, Missouri.

2. On June 15, 2023, the Commission issued its *Order Directing Notice,
Setting Deadline for Intervention Requests, and Directing Filing of Staff
Recommendation*, setting an intervention deadline of July 12, 2023, and ordering Staff to
file its recommendation regarding Leon Travis Blevins’s d/b/a Misty Water Works
(“Blevins” or the “Applicant”) Application no later than August 9, 2023. No intervention
requests were received.

3. On July 6, 2023, Staff issued 44 Data Requests (“DRs”) to Mr. Blevins.
Having not received any responses to those DRs, Staff emailed the Applicant on
July 31, 2023, requesting a status update on when responses to the DRs could be
expected.

4. To date, no response to any of the DRs have been received, although counsel for Staff received a letter from Mr. Blevins on August 7, 2023, requesting a 90-day “or until November 1” extension to answer the DRs.

5. In order to provide sufficient time to complete its investigation, Staff requests an additional 10 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

6. This Motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission’s information and consideration and prays the Commission grant Staff an additional 10 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr

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Missouri Public Service Commission

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 9th day of August, 2023, to Leon Travis Blevins and the Office of Public Counsel.

/s/ Carolyn H. Kerr