

**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 Blevin’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**  
Missouri Bar Number 45718  
Senior Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-751-5397 (Voice)  
573-526-6969 (Fax)  
Carolyn.kerr@psc.mo.gov

Attorney for Staff of the  
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 9<sup>th</sup> day of August, 2023, to Leon Travis Blevins and the Office of Public Counsel.

**/s/ Carolyn H. Kerr**