

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

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc., to Acquire Certain Water) **File No. WM-2020-0282**
and Sewer Assets, and For Certificates of)
Convenience and Necessity)

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 March 11, 2020, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”), filed an *Application and Motion for Waiver* with the Missouri Public Service Commission (“Commission”) requesting approval of its acquisition of the water and/or sewer assets and associated certificates of convenience and necessity (“CCNs”), operated and held by multiple entities in St. Francois, Taney, and Washington Counties, along with the acquisition of the water and/or sewer assets of certain non-certificated entities, and approval of associated new CCNs, in Audrain, Lincoln, Madison, Polk, and Warren Counties. Confluence Rivers also requests a waiver of the Commission’s 60-day notice requirement under 20 CSR 4240-4.017.

2. On April 30, 2020, the Commission issued its *Order Directing Filing*, directing its Staff to file its recommendation regarding Confluence Rivers’ application no later than June 30, 2020.

3. On May 8, 2020, Confluence Rivers filed a request for a “rate of return premium and debt acquisition adjustment” in relation to its proposed acquisition of the assets of Terre Du Lac Utilities Corporation (“Terre Du Lac”). After Staff, on May 15, 2020, filed its *Motion to Dismiss, or in the Alternative, for Additional Notice and*

Re-Establishment of an Intervention Period, Confluence Rivers, on June 1, 2020, filed a notice of voluntary dismissal as to the Terre Du Lac acquisition.

4. The Commission, on June 12, 2020, after no party responded to Confluence Rivers' notice of dismissal, issued its *Acknowledgement of Dismissal*, recognizing that 20 CSR 4240-2.116(1) permits voluntary dismissal without a Commission order before evidence has been offered or prepared testimony filed.

5. Since that time, Staff has continued its review of Confluence Rivers' request to acquire the water and sewer assets of the remaining entities subject to its application. While Staff has completed its inspections of the subject water and sewer systems, certain responses to Staff Data Requests ("DRs") have necessitated the issuance of further DRs; the most recent of which is not required to be responded to until after the Commission's June 30, 2020, deadline for the submission of Staff's recommendation.

6. Therefore, to allow for additional time to complete its discovery in this matter, to finalize its recommendation, and to account for the upcoming July 4th holiday, Staff requests the Commission extend the filing date for Staff's recommendation to July 17, 2020.

WHEREFORE, Staff respectfully submits this *Motion for Extension* for the Commission's information and consideration and hereby requests the Commission order Staff to file its Recommendation no later than July 17, 2020; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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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 26th day of June 2020.

/s/ Mark Johnson