

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

In the Matter of the Application of)
Missouri-American Water Company for)
the Approval of an Agreement with the)
City of Kirkwood, Missouri, to Construct)
Transmission Mains and Points of)
Delivery and to Sell and Deliver Water for)
Resale and Related Tariff Sheets)

Case No. WO-2005-0286

**STAFF'S MOTION FOR LEAVE TO FILE A REQUEST FOR EXTENSION OF TIME
TO FILE STAFF RECOMEMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through its attorney, and, for its *Motion for Leave to File a Request for Extension of Time to File Staff Recommendation*, states to the Missouri Public Service Commission as follows:

1. On February 24, 2005, Missouri-American Water Company applied for authority to build transmission mains and points of delivery to sell and deliver water to the City of Kirkwood, and filed a related tariff sheet, bearing an effective date of March 26, 2005. Missouri-American has subsequently filed letters extending the effective date of the subject tariff sheet to May 25, 2005. The Commission originally ordered the Staff to file its Recommendation in this case no later than March 14, 2005, but had extended this deadline to May 13, 2005.

2. On May 13, 2005, Missouri-American filed with the Commission a letter, extending the effective date of the tariff by thirty days, to June 24, 2005. Staff filed a *Motion to Extend Deadline to File a Recommendation*, to June 10, 2005, which was approved by the Commission.

3. Negotiations among the parties to resolve the issues in this case are ongoing. Missouri-American has today filed with the Commission a letter, extending the effective date of the tariff by thirty days, to July 25, 2005.

5. The Staff therefore requests that its deadline to file a recommendation in this case be extended to July 11, 2005, which will allow the Commission to review and act upon the Staff's recommendation prior to the new effective date of the subject tariff.

WHEREFORE, the Staff moves the Commission for its order for leave to file a request for extension of time to file a Staff recommendation in this case and order granting said request.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Mary E. Weston
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 14th day of June 2005

/s/ Mary E. Weston
Mary E. Weston