

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

Rhonda Martin,)	
)	
Complainant,)	
)	
v.)	<u>Case No. WC-2016-0079</u>
)	
Missouri-American Water Company,)	
)	
Respondent.)	

**STAFF’S MOTION FOR AN EXTENSION OF TIME
WITHIN WHICH TO COMPLETE INVESTIGATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time Within Which to Complete Investigation*, states as follows:

1. Rhonda Martin (Complainant) filed her *Complaint* on September 30, 2015.
2. Thereafter, on October 2, 2015, the Commission ordered Missouri-American Water Company (Respondent) to file an answer by November 2, 2015, and on October 5, 2015, the Commission ordered Staff to investigate the circumstances and file a report thereof not later than November 16, 2015.
3. Respondent failed to file a timely answer, and on November 5, 2015, Staff filed its *Motion for Default Determination* requesting that the Commission enter an order granting default determination against Respondent pursuant to Commission Rule 4 CSR 240-2.070(10).
4. On November 6, 2015, Respondent filed its *Motion for Leave to Late File Answer, Response to Motion for Default, and Answer*.

5. Due to Respondent failing to file a timely answer, and approaching scheduling conflicts, Staff will be unable to complete its investigation and report by November 16, 2015.

6. If the Commission grants Respondent leave to late file its answer, Staff requests an additional fourteen (14) days, up to and including November 30, 2015, within which to complete its investigation and file its report.

WHEREFORE, Staff prays that the Commission will grant it an additional fourteen (14) days, up to and including November 30, 2015, within which to complete its investigation and file its report; and such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by hand delivery, electronic mail, or First Class United States Mail, postage prepaid, to all parties of record on the Service List maintained for this case by the Data Center of the Missouri Public Service Commission, on this 9th day of November, 2015.

/s/ Mark Johnson