

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

In the Matter of Missouri-American Water )  
Company for Certificates of Convenience )  
And Necessity Authorizing it to Install, )  
Own, Acquire, Construct, Operate, Control, )  
Manage, and Maintain Water and Sewer )  
Systems In and around the City of Lawson, )  
Missouri )

Case No. WA-2018-0222

**REQUEST FOR ADDITIONAL TIME TO RESPOND TO STAFF’S RECOMMENDATION**

**COMES NOW** the Office of Public Counsel (“OPC”), by and through undersigned counsel, and files this *Request for Additional Time to Respond to Staff’s Recommendation*, in support thereof OPC states as follows:

1. On February 12, 2018, Missouri-American Water Company (“MAWC”) filed an *Application and Motion for Waiver* to purchase all of the water and sewer assets of the City of Lawson and requested Certificates of Convenience and Necessity for said systems.

2. As part of this application, MAWC seeks to establish the ratemaking rate base associated with the acquired systems using the procedures outlined in Missouri Revised Statute section 393.320, which sets the rate base as the lower of the purchase price for the systems or the appraised value determined by three independent appraisers, together with any reasonable and prudent closing and transaction costs.

3. Staff concedes, and OPC agrees, that “Missouri’s water and wastewater utilities have never elected to use § 393.320.”<sup>1</sup>

4. On May 29, 2018, Staff filed a Recommendation to approve MAWC’s acquisition of the Lawson sewer and water systems subject to 19 enumerated recommendations.

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<sup>1</sup> EFIS, WA-2018-0222, Staff Recommendation, Official Case File Memorandum, Pg. 2.

5. Having reviewed Staff's Recommendations, OPC believes there are significant concerns regarding the Staff's enumerated recommendations, the general method of appraisal, and the parties' recommendation of rates. In sum, OPC believes Staff's current recommendation and the Company's application may be contrary to 393.320.

6. In light of the novelty of this case, OPC requests additional time to review the recommendations and work with the parties.

**WHEREFORE**, the OPC respectfully requests the Commission grant OPC's request for additional time to file a response to Staff's Recommendation.

Respectfully submitted,  
OFFICE OF PUBLIC COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing motion was submitted to all relevant parties by depositing this motion into the Commission's Electronic Filing Information System ("EFIS") on this 15th day of June, 2018.

          /s/ John Clizer