

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

In the Matter of the Application of the)
Branson Cedars Resort Utility)
Company LLC, for a Certificate of)
Convenience and Necessity Authorizing)
it to Own, Operate, Maintain, Control and)
Manage Water and Sewer Systems in)
Taney Co. MO)

File No. WA-2015-0049

MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COMES NOW, the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission for an Order granting an Extension of Time to file its Staff Recommendation in consolidated WA-2015-0049 to April 17, 2015. For its motion for an extension of time, Staff respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On August 15, 2014 the Applicant filed an application for a certificate of convenience and necessity to operate a water utility in case no. WA-2015-0049. Subsequently, the Commission directed the Applicant to file an amended application to include a licensed attorney to represent the limited liability company. The amended application was submitted on August 21, 2014. On August 22, 2014, the Commission issued its *Order Directing Notice and Setting Date for Submission of Intervention Requests*. On December 17, 2014, Branson Cedars, Inc., sought intervention into the case, which the Commission granted. On October 29, 2014, Applicant filed its *First-Amended Application* with the Commission, correcting the entity name to list the name of the LLC which will actually operate the water utility and therefore hold the certificate of convenience and necessity.

2. By order dated September 16, 2014, the Commission directed Staff to file a recommendation in WA-2015-0049 by October 14, 2014. Staff requested its first extension of time to file its recommendation to November 14, 2014, in anticipation and expectation that the Applicant would be filing a parallel application for a certificate of convenience and necessity to operate a sewer utility in the same location. That extension was granted by the Commission on September 30, 2014.

3. On October 29, 2014, the Applicant filed its application for sewer service in case number SA-2015-0107.

4. On November 6, 2014, the Commission consolidated the water and sewer applications into WA-2015-0049 and granted an extension of time for Staff to file its recommendation until February 2, 2015, consistent with the sewer application filing.

5. On January 28, 2015 Staff requested an extension of time based upon notification by the Applicant that documents needed to develop rate base were not in its possession and that it would not be able to obtain those documents from the prior owner of the system. The Commission granted that extension and ordered that Staff file its report by March 6, 2015.

6. Staff is asking the Commission to grant a further extension of time until April 17, 2015, in which to file Staff's recommendation in consolidated case no. WA-2015-0049.

7. This request comes after diligent attempts by the Applicant to obtain original loan and financing documentation, which it was just provided on March 3, 2014, and notification by the County Assessor that Applicant did not complete property tax filings for 2014 correctly thereby necessitating a revaluation of property which is still

being conducted. The property tax figures, given the small size of the rate base in this case, could significantly impact rate base and rates. Staff has been in communication with the Applicant about these matters and has been notified by the County Assessor of the issues associated with the property tax matters.

WHEREFORE, Staff respectfully requests that the Commission grant an extension of time until April 17, 2015, for Staff to file its recommendation in consolidated WA-2015-0049.

Respectfully submitted,

/s/ Cydney D. Mayfield

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by First Class United States Mail, postage prepaid, to all counsel of record this 5th day of March, 2015.

/s/ Cydney D. Mayfield