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

In the Matter of Missouri-American Water Company	)		
for a Certificate of Convenience and Necessity	)		
Authorizing it to Install, Own, Acquire, Construct,	)	Case Nos.	WA-2012-0066
Operate, Control, Manage, and Maintain Water and	)		SA-2012-0067
Sewer Systems in Christian and Taney Counties,	)		
Missouri	)		

## STAFF'S MOTION FOR EXTENSION OF TIME

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and files this *Motion for Extension of Time* with the Missouri Public Service Commission (Commission), respectfully stating the following:

- 1. On August 26, 2011, Missouri American Water Company (Company or MAWC) filed two *Applications* with the Commission, seeking a Certificate of Convenience and Necessity (CCN) for the authority to install, own, acquire, construct, operate, control, manage and maintain water and sewer systems in an incorporated village of Christian and Taney counties, Missouri (jointly referred to as "*Applications*"). These *Applications* were consolidated into Commission File No. WA-2012-0066 on October 17, 2011.
- 2. On September 9, 2011, the Commission issued an *Order Directing Notice and Setting Date for Submission of Intervention Requests*, ordering that notice of MAWC's *Applications* be served to interested parties and setting an intervention deadline of September 29, 2011. No parties intervened in this case.
- 3. On October 3, 2011, the Commission issued an *Order Directing Filing*, directing Staff to file a status report or a recommendation regarding MAWC's applications no later than November 2, 2011.

- 4. On October 27, 2011, Staff filed a *Status Report* stating that it hoped to conclude its investigation and file a Staff Recommendation on or before November 30, 2011. On November 29, 2011, Staff filed a *Motion for Extension of Time*, requesting until December 20, 2011 to file Staff's Recommendation. On November 29, 2011, Staff's request was granted.
- 5. On December 15, 2011, Staff received additional discovery from MAWC related to earlier Staff inquiries. Staff requests additional time to review and analyze this discovery before submitting a Recommendation to the Commission. Staff seeks additional time, until January 6, 2012, to finalize its Recommendation in this matter.
- 6. Counsel for Staff has discussed this motion with counsel for MAWC and received no objection.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time* for the Commission's information and consideration and hereby requests the Commission issue an Order granting Staff until January 6, 2012 to file a Staff Recommendation in this matter.

Respectfully submitted,

## /S/ RACHEL M. LEWIS

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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 counsel of record this 19th day of December, 2011.

/S/ RACHEL M. LEWIS