

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

In the Matter of the Application of)
Se-Ma-No Technologies, LLC, to)
Withdraw and Have Canceled All)
Certificates of Service Authority) Case No. XD-2005-0440, et. al.

MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion, respectfully states as follows:

1. As a result of a prehearing conference held on August 9, 2005, the parties filed a pleading proposing that the parties file either a stipulation of facts or a further procedural schedule by October 11, 2005. On August 12, 2005, the Commission issued its Order Establishing a Date For The Filing Of Either A Stipulation Of Facts Or Further Procedural Schedule that set a filing date of no later than October 11, 2005.

2. Based on current progress, the Staff anticipates filing a Stipulation of Facts that may lead to the settlement of this case. However, due to unanticipated workload commitments, the Staff requests an extension of time for its filing to no later than October 25, 2005. Staff counsel has conferred with Craig Johnson, counsel for Applicants, about this motion for extension of time. Mr. Johnson is unopposed to the granting of this extension.

WHEREFORE, for the reasons stated above, the Staff requests that the Commission grant it an extension of time to not later than October 25, 2005 for the filing of its stipulation of facts.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Robert S. Berlin

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 6th day of October 2005.

/s/ Robert S. Berlin