

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

In the Matter of Elm Hills Utility Operating)
Company, Inc.'s Request for a Water and)
Sewer Rate Increase)

Case No. WR-2020-0275

NOTICE OF EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and for its *Notice of Extension*, respectfully states:

1. On March 6, 2020, Elm Hills Utility Operating Company, Inc. (“Elm Hills”), pursuant to Commission Rule 20 CSR 4240-10.075, filed letters requesting increases in its annual overall operating revenues for its sewer and water services.¹

2. Staff filed a Small Utility Rate Case Timeline on March 13, 2020, specifying due dates for the activities required by 20 CSR 4240-10.075. On July 1, 2020, Staff filed a Notice of Extension, indicating to the Commission that an extension of the timeline by 15 days had been agreed to by Staff, Elm Hills, and the Office of Public Counsel. The July 1st Notice of Extension included an updated timeline reflecting the agreed to extension.

3. While the parties have continued to work towards a resolution of Elm Hills request to increase its annual operating revenues, further additional time is necessary to complete the various activities required by the rule. Therefore, Staff, the Office of the Public Counsel, and Elm Hills have agreed that it is proper to extend the remaining activities in the Timeline by an additional 15 days, pursuant to Commission Rule 20 CSR 4240-10.075(5)(A), which states:

¹ The letters were filed under case numbers SR-2020-0274 and WR-2020-0275, and consolidated by order of the Commission under Case No. WR-2020-0275 on March 25, 2020.

Staff and the utility may agree in writing that the deadlines set out in the rate case timeline, including the date for issuance of the commission's report and order, be extended for up to thirty (30) days. If an extension is agreed upon, staff shall file the agreement and an updated timeline reflecting the extension in the case file.

3. Therefore, Staff submits this *Notice of Extension* as the written agreement contemplated by the rule. Further, attached hereto as Attachment A, is an updated timeline reflected the extension agreed to by the parties.

WHEREFORE, Staff notifies the Commission of the parties' agreement to extend the deadlines set out in the July 1, 2020, updated case timeline filed in this docket, and provides an updated timeline pursuant to said agreement.

Respectfully submitted,

/s/ Mark Johnson

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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 parties and or counsel of record on this 18th day of August, 2020.

/s/ Mark Johnson

Small Utility Rate Case Timeline

MO PSC Case No. WR-2020-0275

Utility Name & Contact Info	Elm Hills Utility Operating Company, Inc.
Contact Person	Aaron Silas
Mailing Address	500 Northwest Plaza Drive, Suite 500, St. Ann, MO 63074
Phone Contact	314-736-4672
E-Mail Address	asilas@cswrgroup.com
Date Case Opened	March 6, 2020
Local Public Hearing?	No later than May 5, 2020
Agreement Filing Due Date	August 3, 2020
9-Month Deadline	December 6, 2020

Set out on the following pages is the activities timeline pertaining to the processing of the above-referenced small utility revenue increase request. This timeline assumes that the Staff's investigation of the revenue increase request will result in a conclusion that an increase in the subject utility's operating revenues is needed, that at least the Utility and Staff will reach an agreement regarding the overall resolution of the request without the need for time extensions, and that the request will be resolved without an evidentiary hearing being held. In such instances where an evidentiary hearing will be held, the 9-month deadline will need to be considered in setting the procedural schedule.

The schedule set out in the timeline establishes the Target Due Date for the completion of certain activities needed to process the request in a timely manner. Extensions of the disposition agreement filing deadline, which is 150 days after the date the utility files its request, and certain other deadlines are allowed and if executed will result in changes to the timeline. Agreements for such extensions, which are limited to a maximum of 30 days, will be reduced to writing and filed in the case file, along with an updated timeline.

The entries in the Target Day column represent the number of days from the date the utility filed its request. The entries in the Target Due Date column show the date when the Target Day hits the calendar. To determine the entries for the Calendar Due Date column, Target Due Dates falling on a weekend or a holiday are moved to the next regular working day, except that the effective dates for pending revised tariff sheets cannot be adjusted.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"
0	03/06/00	N/A	Request Letter Filed and Case Opened (agreement filing due date calculated from this date)	Utility
5	03/11/00	03/11/20	Compliance with Section (2)(A) of Rule Confirmed (case can be dismissed in case of non-compliance)	Case Manager
7	03/13/00	03/13/20	Case Activities Timeline Filed in Case File	Case Manager
10	03/16/00	03/16/20	Draft of Initial Customer Notice Sent to Utility & OPC	Case Manager
20	03/26/00	03/26/20	Requests for Information Needed for Audit Communicated to Utility by Assigned Staff and filed in EFIS	Assigned Staff
20	03/26/00	03/26/20	Initial Customer Notice and Notice of Local Public Hearing Mailed to Customers and filed in EFIS	Utility
40	04/15/00	04/15/20	Responses to Requests for Information Provided to Staff by Utility (staff provides copies of information received to OPC) OR Extension of Agreement Filing Due Date Agreed to by Utility OR Staff May File Motion to Dismiss Case	Utility & Assigned Staff
50	04/25/00	04/27/20	End of Response Period for Initial Customer Notice	N/A
50	04/25/00	04/27/20	Local Public Hearing(s) held no later than 60 days after case initiated	All Parties
75	05/20/00	05/20/20	Deadline for Completion of Construction Projects to be Included in Case OR Agreement Filing Due Date Extended So Projects Can be Included in Case	Utility; Case Manager

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"
80	05/25/00	05/26/20	Basic Audit/Investigation Work Completed	Assigned Staff
85	05/30/00	06/01/20	Initial Audit/Investigation Reports Completed and Provided to Case Manager	Assigned Staff
90	06/04/00	06/04/20	Staff and OPC's Preliminary Audit/Investigation Results Provided to the Parties, including workpapers	Case Manager & OPC
100	06/14/00	06/15/20	Utility & OPC Submit Responses Regarding Staff's Preliminary Report to Case Manager (errors/ommissions to be identified and suggested changes to be included) OR Staff Assumes Information Provided is Acceptable (Staff's audit considered "complete" at this time)	Utility & OPC
115	06/29/00	06/29/20	Any necessary updates to Audit/Investigation Reports finalized and provided to Case Manager	Assigned Staff
120	07/19/20	07/20/20	Staff's Settlement Proposal Sent to the parties and arrangements made for conference call or meeting to discuss the proposal	Case Manager
125	07/24/20	07/24/20	Conference Call or Meeting Held with Utility & OPC to Discuss Staff's Settlement Proposal	Parties to the Case
130	07/29/20	07/29/20	The Parties Notify Staff of Whether They Agree with the Settlement Proposal (if not, the reasons for that and suggested changes to the settlement proposal documents are provided to the Case Manager)	Parties to the Case
			Utility Must Respond OR Agree to Extension of Agreement Filing Due Date OR Staff May File Motion to Dismiss Case	Utility; Case Manager
140	08/23/20	08/24/20	Agreed-Upon Changes to Settlement Proposal Documents Completed and Final Disposition Agreement Sent to Company for Signing (copy also sent to other parties, who may or may not sign)	Case Manager
145	08/28/20	08/28/20	Signed Disposition Agreement Returned to Staff	Utility; OPC (if applicable)
			Staff Sends Revised Tariff Sheets and Draft Tariff Filing Transmittal Letter to the Utility	Case Manager
150	09/02/20	09/02/20	Staff Files Executed Disposition Agreement	Case Manager

Activities needed from this point forward vary based on the approach taken by the OPC. The next three sections set out the activities needed based on the different OPC approaches that are possible.

This section pertains to the situation where only the Utility and Staff reach an agreement on the overall disposition of the request, but OPC or other intervenors have not requested an evidentiary hearing. The dates shown assume that the Utility will make a 30-day tariff filing on Day 155. If an evidentiary hearing is requested, a procedural schedule will be filed for the case beyond day 150 which will supersede this timeline.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"
150	09/02/20	09/02/20	Utility Files Necessary Tariff Revisions with a 45-day effective date	Utility
157	09/09/20	09/09/20	OPC or Other Intervenors File Position Statement(s)	OPC & Other Intervenors
165	09/17/20	09/17/20	Staff Recommendation Filed if applicable OR ordered by the Commission. (Can include motion for suspension of tariff revisions requesting correction of any deficiencies)	Case Manager
185	10/07/20	10/07/20	Order Approving Tariff Revisions Issued	Assigned RLJ
195	10/17/20	10/16/20	Tariff Revisions Effective "On and After" this Date	N/A
210	11/01/20	11/02/20	Notice Closing Case Issued	Assigned RLJ

This section pertains to the situation where all parties reach an agreement on the overall disposition of the request. The dates shown assume that the Utility will make a 30-day tariff filing on Day 155. This timeline assumes the Commission approves the agreement and no evidentiary hearing is necessary.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"
150	09/02/20	09/02/20	Unanimous Disposition Agreement is Filed	Staff
157	09/09/20	09/09/20	Utility Files Necessary Tariff Revisions with a 30-day effective date	Utility
165	09/17/20	09/17/20	Staff Recommendation Filed if Ordered by the Commission. (Can include motion for suspension of tariff revisions requesting correction of any deficiencies)	Case Manager
175	09/27/20	09/28/20	Order Approving Tariff Revisions Issued	Assigned RLJ
187	10/09/20	10/09/20	Tariff Revisions Effective "On and After" this Date	N/A
200	10/22/20	10/22/20	Notice Closing Case Issued	Assigned RLJ

If the parties cannot reach an agreement by day 150 and an evidentiary hearing is necessary, then the parties must file a new procedural schedule in the case. If one of the parties requests and is granted an evidentiary hearing by the Commission prior to day 150, then the remaining dates in this timeline are moot as of the date of that order granting the evidentiary hearing and the parties must file a new procedural schedule.

Target Day	Target Due Date	Calendar Due Date	Case Activity	Responsible "Party"
157	09/09/20	09/09/20	Utility Files Necessary Tariff Revisions	Utility
165	09/17/20	09/17/20	Parties File a Procedural Schedule	All Parties