

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

In the Matter of the Application of South Central)
MCN LLC for Approval of Transfer of Assets and) File No. EA-2016-0036
a Certificate of Convenience and Necessity)

JOINT MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COMES NOW South Central MCN LLC (SCMCN) and the City of Nixa (City), by and through counsel, and requests a four-week extension from September 17, 2015 to October 15, 2015 for the Staff to file its response to the Missouri Public Service Commission’s August 21, 2015 Order Directing Filing of Recommendation regarding the Application of SCMCN. In support thereof, SCMCN and the City state, as follows:

1. On August 19, 2015, SCMCN filed an Application pursuant to Sections 393.170 and 393.190 RSMo., 4 CSR 240-2.060, 4 CSR 240-3.105, and 4 CSR 240-3.110 for an Order of the Commission disclaiming jurisdiction under Section 393.190.1 RSMo. and confirming the inapplicability of 4 CSR 240-3.110 to a certain transaction including the transfer of the certain existing transmission assets to SCMCN by the City pursuant to an Asset Purchase Agreement (“APA”) between SCMCN and the City of Nixa or, in the alternative, authorizing SCMCN and the City of Nixa to execute any and all documents necessary to effectuate the transaction in question.

2. As indicated above, on August 21, 2015, the Commission issued an Order Directing Filing of Recommendation regarding the Application by September 10, 2015, by the Staff.

3. On August 26, 2015, the City filed an Application to Intervene. On September 9, 2015, the Commission issued an Order Granting Intervention to the City.

4. On September 10, 2015, Staff, on behalf of itself and SCMCN, filed a Motion for Extension of Time to File Staff Recommendation, requesting a one-week extension until September 17. The Commission issued an Order granting the motion that same day.

5. Certain outstanding matters are taking longer than expected to complete, although the parties are working diligently to resolve them. Some of the matters are very technical and complicated, necessitating the need for a four-week extension of time. Due to these certain outstanding matters, SCMCN and the City request that the Staff be granted a four-week extension from September 17, 2015 to October 15, 2015 to file its recommendation.

6. Counsel for Staff has authorized the undersigned counsel to state that the Staff supports the Joint Motion for Extension of Time to File Staff Recommendation.

7. Counsel for the Office of the Public Counsel (“Public Counsel”) has authorized the undersigned counsel to state that the Public Counsel has no objection to the Joint Motion for Extension of Time to File Staff Recommendation.

8. Allowing this four-week extension of time is in the public interest because it allows the parties to firm up certain outstanding issues that will provide more complete information to Staff, which will assist them in making a more informed and complete recommendation.

9. SCMCN and the City understand that this motion for a four-week extension of time may impact SCMCN’s request for a decision from the Commission on its Application no later than October 30, 2015, as reflected in SCMCN’s Motion for Expedited Treatment filed on August 19, 2015. Accordingly, SCMCN will also be filing an Amended Motion for Expedited Treatment asking for a decision no later than December 4, 2015 to account for the five-week delay in Staff’s Recommendation. SCMCN and the City apologize for any inconvenience this

delay may cause.

WHEREFORE, SCMCN and the City request that the Staff be granted an extension from September 17, 2015 to October 15, 2015 to file its recommendation.

Respectfully submitted,



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Attorneys for South Central MCN

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 16th day of September, 2015.

A handwritten signature in black ink that reads "Terry M. Jarrett". The signature is written in a cursive style with a horizontal line underlining the name.

Terry M. Jarrett