

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

Anchor’s Point Condominium Owners)
Association, Inc.,)
)
Complainants,)
v.)
)
TRR Management, LLC; Frank J. Steed, Jr.)
d/b/a Steed Communities; JM Land Holdings,)
LLC; TRR Time Share, LLC; Carroll James)
Christiansen; Kimberling Inn, Inc.; and)
Kimberling Properties, Inc.,)
)
Respondents.)

File No. WC-2020-0048

MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension of Time*, states as follows:

1. On August 26, 2019, Anchor’s Point Condominium Owners Association Inc. filed a complaint with the Commission against TRR Management, LLC; Frank J. Steed, Jr. d/b/a Steed Communities; JM Land Holdings, LLC; TRR Time Share, LLC; Carroll James Christiansen; Kimberling Inn, Inc.; and Kimberling Properties, Inc.

2. On August 28, 2019, the Commission issued its *Order Giving Notice of Contested Case and Directing Answer* (“Order”). The Order directed Staff to investigate the complaint and file a report or request for additional time no later than October 11, 2019.

3. In the August 28, 2019 Order the Respondents were ordered to file their responses no later than September 27, 2019. Once these responses established the relationships of the Respondents to the utility services, Staff promptly filed an initial set of

Data Requests (“DRs”) on October 1 and 2, 2019. Responses to these DRs are due by October 21 and 22, 2019.

4. This complaint involves numerous unregulated entities about which Staff has very little information at this time. Staff anticipates that a review of its initial set of DRs will result in the need for further discovery. Staff is also planning a visit to the water system involved in this complaint in November.

5. Because of the anticipated need for further discovery and time needed to review DR responses and complete its report, Staff requests a 90 day extension of the deadline to file its report.

WHEREFORE, Staff prays that the Commission will grant it until January 9, 2020 to conduct further discovery, complete its investigation, and file its report; and such other and further relief as the Commission deems just in these circumstances.

Respectfully Submitted,

/s/ Casi Aslin

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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 11th day of October, 2019.

/s/ Casi Aslin