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 the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, on behalf of itself and South Central MCN LLC ("SCMCN"), the Applicant, and requests a one week extension from September 10, 2015 to September 17, 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, the Staff states, on behalf of itself and SCMCN, 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 of Nixa, Missouri ("City of Nixa") 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. Due to certain outstanding matters the Staff and SCMCN jointly request that the Staff be granted a one week extension from September 10, 2015 to September 17, 2015 to file its recommendation.
- 4. On August 26, 2015, the City of Nixa filed an Application to Intervene. The City of Nixa states in Paragraph 2, page 1 of its Application to Intervene that it supports SCMCN's Application for a certificate of convenience and necessity and any necessary approval to transfer assets filed on August 19, 2015. On September 9, 2015, the Commission issued an Order Granting Intervention to the City of Nixa. Counsel for the City of Nixa has authorized Staff to state that the City of Nixa supports the Joint Motion for Extension of Time to File Staff Recommendation.
- 5. Counsel for the Office of the Public Counsel ("Public Counsel") has authorized counsel for the Staff to state that the Public Counsel supports the Joint Motion for Extension of Time to File Staff Recommendation.
- 6. The Staff and SCMCN do not request that the Staff be granted an extension from September 10, 2015 to September 17, 2015 to file its recommendation to unduly delay the proceedings herein and apologize for any inconvenience this delay may cause.

WHEREFORE, the Staff, on behalf of itself and SCMCN, requests that the Staff be granted an extension from September 10, 2015 to September 17, 2015 to file its recommendation.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim Chief Deputy Staff Counsel Missouri Bar No. 29149 P.O Box 360 Jefferson City, Missouri 65102

Phone: (573) 751-7489 Fax: (573) 751-9285

E-mail: steve.dottheim@psc.mo.gov

Nathan Williams Deputy Staff Counsel Missouri Bar No. 35512 Phone: (573) 751-8702

Fax: (573) 751-9285

E-mail: nathan.williams@psc.mo.gov

Attorneys for the Staff of the Missouri Public Service Commission

Attorneys for South Central MCN LLC

Terry M. Jarrett, Missouri Bar #45663 Healy Law Offices, LLC 514 East High Street, Suite 22 Jefferson City, MO 65101 Phone: (573) 415-8379

Fax: (573) 415-8379

Email: terry@healylawoffices.com

Lowell Pearson, Missouri Bar #46217 Husch Blackwell LLP 235 East High Street, P.O. Box 1251 Jefferson City, MO 65101-3206

Phone: (573) 761-1115 Fax: (573) 634-7854

Email: lowell.pearson@huschblackwell.com

Alison M. Nelson, Missouri Bar #58004 Husch Blackwell LLP 190 Carondelet Plaza, Suite 600 St. Louis, MO 63105-3433 Phone: (314) 480-1592

Fax: (314) 480-1505

Email: ali.nelson@huschblackwell.com

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 10th day of September, 2015.

/s/ Steven Dottheim