BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Missouri-American Water)	
Company for a Certificate of Convenience)	
and Necessity Authorizing it to Install, Own,)	File No. SA-2021-0017
Acquire, Construct, Operate, Control, Manage,)	
And Maintain a Sewer System in and around)	
The City of Hallsville, Missouri.)	

MOTION FOR 6-DAY EXTENSION

COMES NOW, the Boone County Regional Sewer District ("District"), by counsel, and for its Motion for 6-Day Extension of the November 28, 2020 deadline to file a response to the Staff Recommendation to Grant Certificate of Convenience and Necessity, respectfully states as follows:

- 1. On July 20, 2020, Missouri-American Water Company ("MAWC") filed an Application with the Missouri Public Service Commission ("Commission") requesting a Certificate of Convenience and Necessity ("CCN") to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in and around Hallsville, Missouri, as an addition to MAWC's existing service territories.
- 2. On July 23, 2020, the Commission issued an Order Directing Notice, Setting Intervention Deadline, and Directing Staff Filing; in its Order, the Commission directed Staff to file, no later than September 4, 2020, a recommendation or a status report.
- 3. Staff filed its Staff Recommendation to Grant Certificate of Convenience and Necessity ("Staff Recommendation") on November 18, 2020 after receiving several

extensions to enable it to conduct a full and complete analysis of Missouri American Water Company's Request.

- 4. Under 20 CSR 4240-2.080 (13), parties, including the District, have 10 days to file their responses to the Staff Recommendation unless otherwise ordered by the Commission. Accordingly, the parties' deadline to file their responses is November 28, 2020, the Saturday after Thanksgiving (or potentially Monday, November 30, 2020).
- 5. The District, its counsel and consultants are in process of reviewing and evaluating the Staff Recommendation and determining the contents of the District's response to be filed. However, due to the timing of the filing of the Staff Recommendation, the District's General Managers, as well as some of its employees, counsel, board members and counsel, will be unavailable due to traveling and other commitments. In addition, one of the District's consultants is currently battling COVID-19 and is unable to provide professional services to the District at this time.
- 6. For the aforementioned reasons, the current response deadline does not allow the District ample time to prepare and file a complete and informative response to the Staff Recommendation with the Commission.
- 7. The District respectfully requests the Commission to extend the deadline to file a response to the Staff Recommendation by 6 days, from November 28, 2020 to December 4, 2020.

WHEREFORE, the District respectfully submits this Motion for Extension, and hereby requests the Commission extend the deadline for filing responses to the Staff Recommendation to December 4, 2020.

Respectfully submitted,

LATHROP GPM LLP

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Attorney for Boone County Regional Sewer District

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document has be sent via electronic mail this 20th day of November, 2020, to:

Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

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/s/ Jennifer S. Griffin

Jennifer S. Griffin Attorney for Boone County Regional Sewer District