

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

In the Matter of the Application of Black River)
Electric Cooperative and the City of)
Fredericktown, Missouri for Approval of a Written)
Territorial Agreement Designating the Boundaries)
of Each Electric Service Supplier Within a Portion)
of Madison County, Missouri.)

File No. EO-2012-0047

JOINT MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COME NOW Black River Electric Cooperative, the City of Fredericktown, Missouri, and the Staff of the Missouri Public Service Commission and move the Commission for additional time for Staff to file its recommendation as follows:

1. On August 11, 2011, the Commission issued a notice stating that Black River Electric Cooperative and the City of Fredericktown, Missouri, had filed a joint application asking the Commission to approve a territorial agreement and, among other things, ordered, "The Commission's Staff shall file a recommendation regarding the joint application no later than September 1, 2011."

2. Staff has raised an issue the applicants and Staff would like to explore further before Staff files its recommendation. The parties are mindful the Commission is to act within 120 days of August 11, 2011, unless otherwise ordered by the Commission for good cause shown, but believe a delay in Staff's recommendation from September 1, 2011, to October 1, 2011, will not prejudice the Commission, any party or any member of the public, and is in the interest of the applicants.

Wherefore, Black River Electric Cooperative, the City of Fredericktown, Missouri, and the Staff of the Missouri Public Service Commission move the Commission to allow Staff until October 1, 2011, to file its recommendation, with the understanding Staff will file its recommendation shortly after further exploring the issue.

Respectfully submitted,

/s/ Nathan Williams

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/s/ Annette Slack

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 1st day of September, 2011.

/s/ Annette Slack