

**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**

**STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and moves the Commission for additional time 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.       Due to other press of business, Staff is unable to file its recommendation at this time. Mindful the Commission is to act within 120 days of August 11, 2011, unless otherwise ordered by the Commission for good cause shown, Staff believes an additional day delay in Staff's recommendation until October 4, 2011 will not prejudice the Commission, any party or any member of the public, and is in the interest of the applicants.

**Wherefore**, Staff prays the Commission to allow Staff until October 4, 2011, to file its recommendation.

Respectfully submitted,

**/s/ Nathan Williams**

Nathan Williams  
Deputy Counsel  
Missouri Bar No. 35512

**/s/ Annette Slack**

Annette Slack  
Chief Litigation Counsel  
Missouri Bar No. 50601

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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 3<sup>rd</sup> day of October 2011.

**/s/ Annette Slack**