

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

In the Matter of the Joint Application of)
Grundy Electric Cooperative and The City of)
Galt, Missouri for Approval of a Written)
Territorial Agreement Designating the)
Boundaries of each Electric Service Supplier) **Case No. EO-2022-0098**
within the City of Galt, Grundy County,)
Missouri, and Approving the Change of)
Electric Service Supplier for Customers of the)
City of Galt Municipal Electric System)

MOTION FOR ADDITIONAL TIME

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through counsel, and requests until no later than Wednesday, December 1, 2021, to file its recommendation in the above-captioned case, while committing to endeavor to file a recommendation as soon as possible.

1. On October 1, 2021, Grundy Electric Cooperative and The City of Galt, Missouri, (Joint Applicants) filed a Joint Application for an order approving a Territorial Agreement and approval of a change of electric supplier (Joint Application). Staff's recommendation in the case is currently due no later than Friday, November 5, 2021.¹

2. Staff is currently still reviewing and waiting on information to provide a fully informed recommendation on the Joint Application, and while Staff intends to file its recommendation as soon as possible, requests that the deadline be moved to no later than Wednesday, December 1, 2021.

3. Staff's request for additional time is not intended to unduly prejudice or delay the outcome of this case, and anticipates that the additional time granted to Staff

¹ Order Directing Notice, Setting Intervention Deadline and Directing Staff Recommendation, Case Number EO-2022-0098 (EFIS No. 2, Oct. 6, 2021).

will still permit the Commission a reasonable amount of time to rule on the Joint Application within the 120 days required under Section 394.312, RSMo (2016).

WHEREFORE, Staff requests the Commission issue an order directing Staff to file its recommendation on the Joint Application as soon as possible, and in no event later than Wednesday, December 1, 2021, and for such other and further relief as the Commission deems just under the circumstances.

Respectfully submitted,

/s/ Curt Stokes

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**Counsel for Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 4th day of November, 2021, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes