

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

In the Matter of the Application of The City of St. Robert )  
and Laclede Electric Cooperative for Approval of a First )  
Addendum to the Parties' Second Territorial Agreement )  
Designating the Boundaries of Exclusive Service Areas )  
Within Portions of Pulaski County )

**File No. EO-2022-0143**

**REQUEST FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and for its request for extension respectfully states:

1. On November 29, 2021, the City of St. Robert and Laclede Electric Cooperative (“Parties”) filed a joint application for approval of a First Addendum to the Parties' Second Territorial Agreement designating the boundaries of exclusive service areas within portions of Pulaski County.

2. On December 2, 2021, The Commission ordered Staff to investigate and file a report detailing its findings and recommendations no later than January 18, 2022.

3. Staff requested the Parties to update the Application to include the Second Territorial Agreement proposed to be amended so that document is included in the record in this case. Said document was uploaded to EFIS on January 12, 2022.

4. Staff submitted two Data Requests (DRs) to the Parties concerning details of the facilities currently in place to serve the anticipated additional territory’s structures and the corresponding load expectancy. The Parties have until February 2, 2022 to respond to Staff’s DRs, and Staff is still awaiting receipt of the Parties’ responses.

5. Staff requests an additional three weeks to file Staff’s recommendation in order to grant the Parties time to submit responses to the DRs and for Staff to perform

any necessary review of the additional information in preparation of Staff's recommendation. The new filing date would be February 8, 2022.

6. Commission Rule 20 CSR 4240-2.070(15)(D) states, "The regulatory law judge may allow staff additional time to complete its investigation for good cause shown."

7. Due to the impact the additional information may have on Staff's report, the requisite good cause exists for an extension.

**WHEREFORE**, Staff respectfully requests that the Commission grant its Request for Extension, and any other relief the Commission deems just and proper under the circumstances.

Respectfully submitted,

**/s/ Don Cosp**

Don Cosp

Legal Counsel

Missouri Bar No. 73231

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-4140 (Telephone)

(573) 751-9285 (Fax)

[don.cosp@psc.mo.gov](mailto:don.cosp@psc.mo.gov)

### **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 18th day of January, 2022, to all counsel of record.

**/s/ Don Cosp**