BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Confluence Rivers)	
Utility Operating Company, Inc., for Certificates of)	
Convenience and Necessity to Provide Water and)	File No. WA-2024-0048
Sewer Service in an Area of Warren County,)	
Missouri (Lake Sherwood Estates).	ĺ	

MOTION FOR AN EXTENSION OF STAFF'S TIME TO FILE A RECOMMENDATION

COMES NOW Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers"), by and through the undersigned counsel, and for its *Motion for an Extension of Staff's Time to File a Recommendation*, states as follows to the Missouri Public Service Commission ("Commission"):

- 1. On August 25, 2023, Confluence Rivers filed an *Application and Motion for Waiver*, concerning the acquisition of all or substantially all of the water and sewer system assets of the currently unregulated systems of Lake Sherwood Estates Association. Confluence Rivers seeks Certificates of Convenience and Necessity ("CCN") to operate the systems and provide service to the public. On September 13, 2023, the cases were consolidated, with File No. WA-2024-0048 being the lead case.
- 2. On October 13, 2023, the Commission issued its *Order Directing Filing*, directing Staff to file its Recommendation in this matter no later than November 28, 2023.
- 3. Confluence Rivers has not yet been able to respond to Staff's Data Request 0017 regarding plant-in-service valuation as its appraiser has been delayed in submitting the valuation to Confluence Rivers due to a family health emergency.
- 4. Without such valuation, Staff has indicated that it would likely calculate Rate Base for the purposes of its Recommendation at \$0.

- 5. Confluence Rivers requests that the Commission extend the date for Staff to file its recommendation until January 11, 2023, so that Confluence Rivers may submit its plant-inservice valuation to Staff for its consideration in regard to its Recommendation.
- 6. Counsel for Staff has indicated that Staff has no objection to this proposed extension.

WHEREFORE, Confluence Rivers Utility Operating Company, Inc., requests the Commission issue an order extending Staff's deadline for filing its Recommendation until January 11, 2023, and grant such further and other relief as is just and proper in the circumstances.

Respectfully submitted,

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ATTORNEYS FOR CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on November 14, 2023, to the following:

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