

**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).)

**MOTION FOR AN ADDITIONAL 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 Additional 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. On November 14, 2023, Confluence filed its *Motion for an Extension of Staff’s Time to File a Recommendation*, requesting an extension of the filing deadline for Staff’s recommendation to January 11, 2024. The Commission issued its *Order Granting Motion for Extension* the very same day.
4. Confluence Rivers has not yet been able to respond to Staff’s Data Request 0017

as the Seller has been delayed in submitting information that supports valuation to Confluence Rivers due to complications regarding the gathering of such data.

5. Confluence Rivers continues to work with the Seller to acquire the necessary data to complete the valuation report.

6. Confluence Rivers requests that the Commission extend the date for Staff to file its recommendation from January 11, 2024, to February 26, 2024, so that Confluence Rivers may submit its plant-in-service valuation to Staff for its consideration in regard to its Recommendation.

7. 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 February 26, 2024, 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 December 20, 2023, to the following:

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