

**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) **File No. WA-2024-0048**
To Provide Water and Sewer Service in an) **File No. SA-2024-0049**
Area of Warren County, Missouri (Lake)
Sherwood Estates)

STAFF’S MOTION FOR DEADLINE EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and prays the Commission grant Staff an extension of its Recommendation deadline from January 11, 2024, to February 26, 2024. Staff states:

On August 25, 2023, Confluence Rivers Utility Operating Company, Inc. (Confluence) filed the above-referenced applications. On September 24, 2023, the Commission granted consolidation and ordered Staff to file, no later than October 12, 2023, a recommendation or a status report stating when it expected to file a recommendation. On October 13, 2023, the Commission ordered Staff to file its recommendation no later than November 28, 2023. Thereafter, on Confluence’s motion, the Commission extended the deadline to January 11, 2024. Each extension was at Confluence’s request and based upon its inability to respond the Staff’s data requests. On December 20, 2023, Confluence asked for another Staff recommendation deadline extension to February 26, 2024. The Commission may review Confluence’s pleadings for Confluence’s stated reasons for the extensions. In its pending motion, Confluence correctly stated that Staff had no objection to the proposed extension.

The Commission has not ruled on Confluence’s December 20 deadline extension request, and so the Commission’s order still stands requiring Staff to file a

recommendation no later than January 11, 2024. Thus, this motion. Based on the posture of discovery and Staff's ability to investigate the case sufficiently, Staff is unable to file a recommendation on January 11, 2024. Staff now joins in Confluence's motion to extend the deadline for Staff's recommendation to February 26, 2024.

WHEREFORE, Staff asks for the relief described in the body of this motion.

Respectfully Submitted,

/s/ Paul T. Graham #30416

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**ATTORNEY FOR THE STAFF OF THE
MISSOURI PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on January 9, 2024, he filed the above captioned pleading in the EFIS file of the Missouri Public Service Commission.

/s/ Paul T. Graham