

**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 EXTENSION
OF TIME TO FILE RESPONSE TO STAFF 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 Time to File Response to Staff 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 Rivers 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. On December 20, 2023, Confluence Rivers filed its *Motion for an Additional*

Extension of Staff's Time to File a Recommendation. On January 9, 2024, Staff filed its *Staff's Motion for Deadline Extension*. Both motions requested that the deadline for the filing of Staff's recommendation be extended to February 26, 2024 based upon certain data request regarding plant-in-service valuation. The Commission granted Confluence Rivers' and Staff's motions on January 9, 2024.

5. On February 26, 2024, Staff filed its *Staff's Recommendation*, requesting the Commission approve Confluence Rivers' application in the instant case, subject to certain conditions outlined in the *Staff Memorandum*.

6. Pursuant to 20 CSR 4240-2.080(13), Confluence Rivers is requesting an extension of time in which to respond to Staff's *Recommendation* from March 7, 2024, to March 21, 2024, as to allow Staff and Confluence Rivers to discuss certain requirements contained in Staff's proposed conditions.

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 Confluence Rivers' deadline for filing its Response to *Staff's Recommendation* until March 21, 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 March 6, 2024, to the following:

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