# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Advance Notice of Merger of Southwestern Bell Telephone Company d/b/a AT&T Missouri Name to Southwestern Bell Telephone Company, LLC d/b/a AT&T Missouri (LLC)

### File No. TN-2024-0278

### File No. DN-2024-0279

Tracking Nos. JI-2024-0137, JI-2024-0138, JI-2024-0139, JI-2024-0140, JI-2024-0142

### MOTION FOR EXTENSION OF TIME

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), through the undersigned counsel, and for its Motion for Extension of Time, hereby respectfully states as follows:

1. On April 1, 2024, Southwestern Bell Telephone Company d/b/a AT&T Missouri ("Southwestern Bell Telephone Company" or "Company") requested that the Commission recognize its name change to Southwestern Bell Telephone Company, LLC d/b/a AT&T Missouri LLC.

2. On April 2, 2024, the Commission ordered Staff to file a recommendation regarding Southwestern Bell Telephone Company's request no later than April 12, 2024.

3. Due to the nature and timing of the conversion transaction that will occur on May 1, 2024, Southwestern Bell Telephone Company is unable to provide the documentation required by 20 CSR 4240-28.011(2)(A)2 before April 12, 2024. It is Staff's understanding that following the Company's Delaware conversion, Southwestern Bell Telephone Company, upon filing and receipt of its registration documentation from the Missouri Secretary of State, will promptly provide all registration documentation to the Commission as required.

4. To provide sufficient time for the Company to file the documentation and for Staff to complete its review, Staff Requests an additional 30 days to complete and file its

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recommendation. Staff will attempt to complete its review prior to any newly-established filing date.

5. This Motion is made in the interest of justice and without the intent to unreasonable delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully submits this Motion for Extension of Time for the Commission's information and consideration and hereby prays the Commission grant Staff an additional 30 days within which to file its recommendation in this matter; and to grant such other and further relief as is just in the circumstances.

Respectfully submitted,

# <u>/s/ Ron Irving</u>

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# **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 12<sup>th</sup> day of April, 2024, to all counsel of record.

# <u>/s/ Ron Irving</u>