

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of)
Confluence Rivers Utility Operating)
Company, Inc. to Acquire Certain Sewer) **File No. SA-2024-0307**
Assets and for a Certificate of Convenience)
and Necessity (Timber Ridge))

MOTION TO SUSPEND FILING OF STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Motion to Suspend Filing of Staff Recommendation*, states as follows:

1. On April 18, 2024, Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) filed an application requesting that the Commission approve the acquisition of the unregulated sewer assets of Barbara E. Rampone located in and around the Timber Ridge subdivision in Johnson County, MO (Timber Ridge).¹

2. On July 23, Confluence Rivers and Staff filed a request for a further extension of time. Confluence Rivers stated that it believes that the expectations of the Missouri Department of Natural Resources (“DNR”) may require more immediate action than originally thought, and, accordingly, there likely will be implications as to the rate proposal. Therefore, Confluence Rivers stated that it plans to file a request to amend its application to address this issue.

3. On July 25, 2024, the Commission granted a further extension of time of 60 days, counted from July 25, 2024, but stated, “[i]f this time frame proves insufficient, the parties are free to file a request for an additional extension of time.”

¹ On May 1, 2024, Confluence Rivers filed a *Supplement to Application*, which included the Engineering Memorandum concerning the Timber Ridge Waste Water Treatment Plant.

4. At this time, Confluence Rivers has yet to submit a request to amend its application. Staff has inquired with counsel for Confluence Rivers and was informed that discussions with DNR continue and Confluence Rivers is unsure as to the date by which it will file said request to amend its application. As such, Staff respectfully requests that the Commission suspend the requirement for Staff to file a recommendation until such time that Confluence Rivers files an amended application, and a new filing date for a Staff Recommendation is set by the Commission.

5. In the alternative, Staff requests an additional 60-day extension, until November 22, 2024.

6. Staff has discussed this pleading with counsel for Confluence Rivers, and understands Confluence Rivers has no objection to Staff's request. This filing is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

WHEREFORE, Staff respectfully requests that the Commission will suspend the requirement for Staff to file a recommendation, until such time Confluence Rivers files an Amended Application and the Commission establishes a new filing date for Staff's Recommendation. In the alternative, Staff requests the Commission grant an additional 60-day extension; and grant such other and further relief as the Commission deems just in these circumstances.

Respectfully submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 23rd day of September, 2024.

/s/ Mark Johnson