

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

In the Matter of the Application of )  
Confluence Rivers Utility Operating )  
Company, Inc. and United Fiber, LLC )  
d/b/a United Fiber MO, LLC, for Authority ) File No. SM-2025-0080  
to Acquire and Sell Certain Sewer Assets )  
in an Area of Nodaway and Andrew )  
Counties, Missouri. )

**MOTION FOR EXTENSION OF DATE TO RESPOND  
TO STAFF RECOMMENDATION**

COMES NOW the Confluence Rivers Utility Operating Company, Inc. (“Confluence Rivers”) and, *Motion for Extension of Date to Respond to Staff Recommendation*, states as follows to the Missouri Public Service Commission (“Commission”):

1. On September 4, 2024, Confluence Rivers and United Fiber, LLC d/b/a United Fiber MO, LLC (“United Fiber”) filed a *Joint Application and Motion for Waiver* with the Commission requesting that it grant United Fiber authority to sell to Confluence Rivers certain sewer assets in an area of Nodaway and Andrew Counties, Missouri.

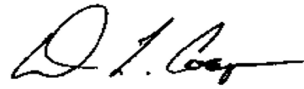
2. On November 1, 2024, the Staff of the Commission (“Staff”) filed its *Report and Recommendation*. The *Report and Recommendation* concludes that granting permission to transfer the assets will not be detrimental to the public interest. However, it further suggests that the Commission grant Confluence Rivers a Certificate of Convenience and Necessity to provide sewer service with certain orders and requirements. Confluence Rivers has begun to discuss those orders and requirements with Staff and needs additional time to complete those discussions before responding to the *Report and Recommendation*.

3. Therefore, Confluence Rivers requests a thirty (30) day extension, until December 11, 2024, for the applicants to respond to Staff’s *Report and Recommendation*.

4. Counsel for Confluence Rivers has discussed this pleading with counsel for Staff; and understands Staff has no objection to Confluence Rivers' request.

**WHEREFORE**, Confluence Rivers respectfully requests that the Commission grant a thirty (30) day extension for responses to the *Report and Recommendation*; and grant such other and further relief as the Commission deems reasonable.

Respectfully submitted,



Dean L. Cooper MBE #36592  
**BRYDON, SWEARENGEN & ENGLAND P.C.**  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65012  
(573) 635-7166 telephone  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

David L. Woodsmall MBE #40747  
**Central States Water Resources**  
1630 Des Peres Rd., Suite 140  
Des Peres, MO 63131  
[dwoodsmall@cswrgroup.com](mailto:dwoodsmall@cswrgroup.com)

**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 November 12, 2024, to the following:

Office of the General Counsel  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
[opcservice@opc.mo.gov](mailto:opcservice@opc.mo.gov)

William S. Lewis, MBE #39119  
[wlewis@lawofficemo.com](mailto:wlewis@lawofficemo.com)

