BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of Confluence Rivers Utility Operating Company, Inc., and Missouri-American Water Company for Authority for Confluence Rivers Utility Operating Company, Inc., to Acquire Certain Sewer Assets of Missouri-American Water Company in Callaway and Morgan Counties, Missouri

File No. SM-2025-0067

JOINT MOTION FOR EXTENSION OF TIME TO FILE A REPLY TO THE OFFICE OF PUBLIC COUNSEL RESPONSE

COME NOW the Staff of the Missouri Public Service Commission ("Staff"), Confluence Rivers Utility Operating Company, Inc. ("Confluence"), and Missouri-American Water Company ("MAWC"), and for this *Joint Motion for Extension of Time to File a Reply to the Office of Public Counsel Response,* state:

1. On August 27, 2024, Confluence and MAWC filed a Joint Application and

Motion for Waiver ("Application") with the Missouri Public Service Commission ("Commission"), asking the Commission to authorize a transaction in which Confluence would acquire nineteen (19) small wastewater systems from MAWC.

2. On December 30, 2024, Staff filed its Staff Report and Recommendation

("Report") with the Commission. In this Report, Staff recommended that the Commission authorize the acquisition.

3. On January 10, 2025, in response to Staff's Report, the Office of Public Counsel ("OPC") filed a *Response to Staff Recommendation* ("Response"), stating concern regarding the acquisition and asking the Commission to impose four (4) additional conditions on the proposed transaction.

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4. Also on January 10, 2025, the Commission ordered Confluence and MAWC to either reply to OPC's Response or request an extension by January 21, 2025.

5. Confluence, MAWC, and Staff will potentially file a joint reply to OPC's Response. Therefore, Confluence, MAWC, and Staff request an extension of time to file this reply. These parties believe they will be able to file the joint reply by January 28, 2025. The parties will endeavor to file the joint reply earlier, if possible. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings.

WHEREFORE, Staff prays the Commission grant the parties seven additional days (until January 28, 2025) within which to file their reply and to grant such other relief as the Commission considers just and reasonable.

Respectfully submitted,

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ATTORNEYS FOR CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC. AND MISSOURI-AMERICAN WATER COMPANY

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 17th day of January, 2025.

/s/ Andrea B. Hansen