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

In the matter of the application of The	)	
Raytown Water Company for an Order	)	File No. WF-2021-0131
Authorizing Issuance of Preferred Stock	)	· · · · · · · · · · · · · · · · · · ·

## REQUEST FOR WAIVER

Comes now The Raytown Water Company (Applicant) pursuant to 20 CSR 4240-4.017(1)(D) and hereby requests a waiver of the sixty day notice of case filing required by 20 CSR 4240-4.017(1). In support of this request, Applicant states:

- 1. Pursuant to 20 CSR 4240-4.017(1), an applicant must file a sixty day notice prior to filing an application. Under subsection (D) of such regulation, an applicant may request that such notice be waived for good cause. Good cause may include a verified declaration from the filing party that it has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case or that circumstances prevented filing the required notice and delaying the filing for sixty (60) days would cause harm.
- 2. Circumstances prevented the filing of a notice of this Application. Pursuant to the Order Approving Unanimous Disposition Agreement entered on September 8, 2020 in Case No. WR-2020-0264 for Tariff No. YW-2021-0022, Applicant was ordered to and agreed to file a new case before the Commission within sixty (60) days of the effective date (September 8, 2020) for an order to acquire financing needed to begin making necessary improvements to its system. The Application filed on November 4 was in compliance with that Order, and it was deemed by Applicant that compliance with the required notice had been achieved.

3. Alternatively, Applicant asserts that the Applicant and its principals have had no communication with the office of the commission within the prior one hundred fifty (150) days

regarding any substantive issue likely to be in the case.

4. In addition, delaying the filing of the Application for another sixty (60) days would cause harm in that the financing of the infrastructure improvements to be paid for by the financing

requested will be delayed and the infrastructure will be subject to further deterioration.

4. The Raytown Water Company hereby requests that the sixty (60) day notice

required by 20 CSR 4240-4.017(1) be waived.

WHEREFORE, Applicant The Raytown Water Company, respectfully requests that the

sixty (60) day notice required by 20 CSR 4240-4.017(1) be waived under subsection (D) of such

regulation, and that Applicant be granted such further relief as the Commission deems just.

THE RAYTOWN WATER COMPANY

By President and General Manager

STATE OF MISSOURI	)
	) ss
COUNTY OF JACKSON	)

The undersigned, a Notary Public in and for said state, hereby certifies that the foregoing was subscribed and sworn to by NEAL CLEVENGER, who stated that he had the authority to execute the foregoing on behalf of the Applicant, this day of November, 2020.

My Commission Expires: Nov. 7, 2022

CHIKAKO CLEVENGER THOMPSON Notary Public - Notary Seal STATE OF MISSOURI Comm. Number 14631035 Jackson County My Commission Expires: Nov. 7, 2022 Notary Public Thompson

## Respectfully submitted,

## THE BLAUVELT LAW FIRM, LLC

By <u>/s/ Janet Blauvelt</u>
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ATTORNEYS FOR APPLICANT