

6. Staff sent out data requests on April 26, 2016 and April 27, 2016. Staff has not received all of the responses to those data requests. Further, based on the responses Staff has received, Staff needs additional time to conduct further investigation.

7. Staff requests additional time within which to complete its investigation and file its report. All parties have stated that they support Staff's request for additional time.

8. MPGA, Summit, Office of the Public Counsel, and Staff are currently working together to provide the Commission with a proposed procedural schedule in this matter. At this time it is anticipated that the forthcoming, jointly filed procedural schedule proposal will specify a date upon which Staff will file its report.

WHEREFORE, Staff prays that the Commission will grant it additional time within which to complete its investigation and file its report; and such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 17th day of May, 2016.

/s/ Jamie S. Myers