

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

COMMERCE TOWER GROUP, LLC)	
)	
Complainant,)	
)	
v.)	Case No. HC-2016-0056
)	
VEOLIA ENERGY KANSAS CITY, INC.)	
)	
Respondent.)	

**AGREED MOTION FOR EXTENSION OF TIME TO
RESPOND TO FIRST FORMAL COMPLAINT**

Respondent Veolia Energy Kansas City, Inc. (“Veolia”) moves the Public Service Commission (“Commission”) for a ten (10) day extension of time, up to and including October 22, 2015, in which to answer or otherwise respond to Complaint Commerce Tower Group, LLC’s (“CTG”) First Amended Formal Complaint. In support of its motion, Veolia states as follows:

1. CTG filed its Formal Complaint on September 11, 2015.
2. On September 11, 2015, the Commission issued an Order Giving Notice of Contested Case, Directing Answer, and Directing Staff Investigation (the “Order”).
3. In the Order, Veolia was directed to respond to the Complaint or request mediation no later than October 12, 2015.
4. Veolia seeks an Order extending the time to respond to the Complaint or request mediation by ten (10) days, up to and including October 22, 2015.
5. Counsel for Veolia has consulted with counsel for CTG, and CTG consents to the proposed extension.

6. This motion is not filed for the purpose of delay or harassment, but rather to allow the parties additional time to explore resolution of this dispute.

7. Staff Counsel has been consulted regarding this request, and Staff Counsel does not oppose this request.

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ James D. Lawrence
James D. Lawrence, #53411
1200 Main Street, Suite 3800
Kansas City, MO 64105-2100
Telephone: (816) 374-3200
Facsimile: (816) 374-3300
jdlawrence@bryancave.com

Carole L. Iles, #33821
Edward F. Downey, #28866
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone: (573) 556-6621
Facsimile: (573) 556-6630
carole.iles@bryancave.com
efdowney@bryancave.com

Diana M. Vuylsteke, #42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2569
Facsimile: (314) 259-2020
diana.vuylsteke@bryancave.com

ATTORNEYS FOR VEOLIA ENERGY
KANSAS CITY, INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been transmitted by e-mail this 8th day of October, 2015, to all parties on the Commission's service list in this case.

/s/ Diana M. Vuyksteke