

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Braden Park, LLC's Application)	
for Certificate of Convenience and Necessity to)	<u>File No. WA-2011-0260</u>
Provide Water Service.)	

STAFF'S MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and files this *Motion for Extension of Time (Motion)* with the Missouri Public Service Commission (Commission), respectfully stating the following:

1. On February 14, 2011, Braden Park, LLC (Braden Park or Applicant) filed an *Application For Certificate Of Convenience And Necessity To Provide Water Service (Application)* to Braden Park Village subdivision located in Benton County, Missouri.

2. On February 15, 2011, the Commission issued an Order that directed the filing of applications to intervene no later than March 7, 2011. The Commission received no such applications.

3. On March 7, 2011, Staff filed a *Motion for Extension of Time to File an Agreement in Lieu of Recommendation* seeking until May 6, 2011 to file an Agreement with the Commission.

4. Since the March 7, 2011 filing, Staff has continued to engage in discussions with the Applicant. Staff and the Applicant believe they can satisfactorily resolve this matter and Staff requests an additional forty-five (45) days to file its Response to the *Application*.

WHEREFORE, Staff respectfully submits this *Motion* for the Commission's consideration and respectfully requests that the Commission allow until June 22, 2011, for Staff to file its Response to the *Application*.

Respectfully submitted,

/s/ Rachel M. Lewis

Rachel M. Lewis
Deputy Counsel
Missouri Bar No. 56073

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-6715 (Telephone)
(573) 751-9285 (Fax)
rachel.lewis@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 5th day of May, 2011.

/s/ Rachel M. Lewis