

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

In the Matter of the Joint Application of)
Algonquin Water Resources of Missouri, LLC,)
d/b/a Liberty Water for Authority for Liberty)
Water to Acquire Certain Assets of Noel Water)
Co., Inc. and, in Connection Therewith, Certain)
Other Related Transactions.)

Case No. WO-2011-0328

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 April, 6, 2011, a *Joint Application of Algonquin Water Resources of Missouri, LLC, d/b/a Liberty Water for Authority for Liberty Water to Acquire Certain Assets of Noel Water Co., Inc. and, in Connection Therewith, Certain Other Related Transactions (Joint Application)* was filed with the Commission.

2. On April 13, 2011, the Commission issued an Order providing that any application to intervene should be filed no later than May 3, 2011. No such application was filed with the Commission.

3. On May 4, 2011, the Commission issued an *Order Directing Filing* that directed the Staff to file a Recommendation or, in the alternative, a pleading stating when it plans on filing a Recommendation no later than May 24, 2011.

4. Staff is currently investigating the financial, technical, and economic implications of the proposed transaction. Among other items, Staff has scheduled meetings with city officials and on-site visits as well as submitted data requests to which responses are not yet received.

5. Staff anticipates that an extension of sixty (60) days, until July 25, 2011 will be sufficient time to provide a Recommendation and hereby requests such an extension of time.

WHEREFORE, Staff respectfully submits this *Motion* to the Commission for its information and consideration, and respectfully requests that the Commission allow until July 25, 2011, for Staff to file a Recommendation in this matter.

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, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 24th day of May, 2011.

/S/ RACHEL M. LEWIS