

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

The Staff of the Missouri Public Service Commission,)	
)	
v.)	Case No. SC-2007-0396
)	WC-2007-0394
Central Jefferson County Utilities, Inc., et al.)	

**CENTRAL JEFFERSON'S
MOTION FOR EXTENSION OF TIME TO RESPOND**

Comes now Central Jefferson County Utilities, Inc. (Central Jefferson), by and through its counsel, and, pursuant to 4 CSR 240-2.050(3), respectfully states the following to the Missouri Public Service Commission (Commission) as its Motion for Extension of Time to Respond to the Commission Staff's Motion for Partial Summary Determination:

1. On June 15, 2007, the Commission Staff filed its Motion for Partial Summary Determination.

2. Commission Rule 4 CSR 240-2.117(1)(C) provides that "[n]ot more than thirty (30) days after a motion for summary determination is served, any party may file and serve on all parties a response in opposition to the motion for summary determination." Central Jefferson's responsive pleading would therefore be due on July 16, 2007 (the first business day after July 15, 2007. See Commission Rule 4 CSR 240-2.050(1)).

3. Commission Rule 4 CSR 240-2.050(3) states that "when an act is required or allowed to be done by order or rule of the commission at or within a specified time, the commission, at its discretion, may – (A) order the period enlarged before the

expiration of the period originally prescribed”

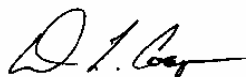
4. Due to the lengthy nature of the Staff’s Motion (it contains forty-eight (48) specific factual allegations) and counsel’s press of other business, it will be difficult for Central Jefferson to respond in a complete and thorough manner by July 16, 2007.

5. Therefore, Central Jefferson hereby requests a one week extension, or until July 23, 2007, to respond to the Staff’s Motion for Partial Summary Determination.

6. The undersigned has communicated with counsel for the Commission Staff and Office of the Public Counsel, as well as the other parties to this case, and been informed by those counsel that no party has an objection to this motion for extension.

WHEREFORE, Central Jefferson respectfully requests that the Commission issue its order granting Central Jefferson an extension of time until July 23, 2007, to respond to Staff’s Motion for Summary Determination.

Respectfully submitted,



William R. England III #23975
Dean L. Cooper #36592
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166 Phone
(573) 634-7431 Fax
dcooper@brydonlaw.com

Attorneys for Central Jefferson County Utilities,
Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via electronic mail or by U.S. Mail, postage prepaid, on this 12th day of July, 2007, to:

Kevin Thompson
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Dana Hockensmith
Hockensmith Tatlow McKinnis, P.C.
12801 Flushing Meadow Dr.
St. Louis, MO 63131

Christina Baker
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

Richard A. Wunderlich
Lewis, Rice & Fingerish, L.C.
500 N. Broadway, Suite 2000
St. Louis, MO 63102

