BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Application of Canyon Treatment)
Facility, LLC for Permission, Approval and a)	
Certificate of Convenience and Necessity)
Authorizing it to Acquire, Construct, Install, Own,) Case No. SA-2010-0219
Operate, Control, Manage, and/or Maintain a Sew	er)
System for the Public Located in Stone County,	,)
Missouri)	•

STAFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and respectfully provides *Staff's Motion for Extension of Time to File Response* to the Commission stating the following:

- 1. On January 21, 2010, Canyon Treatment Facility, LLC, (Canyon Treatment) filed an Application for Permission, Approval and a Certificate of Convenience and Necessity (CCN) Authorizing it to Acquires, Construct, Install, Own, Operate, Manage, and/or Maintain a Sewer System for the Public Located in Stone County, Missouri.
 - 2. Staff filed its *Recommendation* on December 22, 2011.
- 3. On February 22, 2012, the Commission issued an *Order Directing Filing* (*Order*) directing Staff to file a pleading stating "whether there are legal or practical concerns with the Commission first directing Staff to find a receiver. And, in an order appointing that receiver, grant the sought-after certificate."
- 4. Staff hereby requests additional time, until March 30, 2012, to file any response the Commission's *Order*. This time will allow Staff to further analyze the effect

of such a proposed order and to allow for additional discussions with potential receivers and/or purchasers of the system.

WHEREFORE, Staff respectfully submits this *Motion for Extension of Time to File Response* and respectfully requests the Commission grant Staff until March 30, 2012, to file a response to the Commission's *Order Directing Filing* issued on February 22, 2012.

Respectfully submitted,

/s/ Rachel M. Lewis

Rachel M. Lewis Deputy Counsel Missouri Bar No 56073

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CERTIFICATE OF SERVICE

I hereby certify that I have provided a true and correct copy of the above pleading via electronic mail to W.R. England III and Brian T. McCartney, attorneys for Canyon Treatment Facility, LLC, at trip@brydonlaw.com; and bmccartney@brydonlaw.com; David Woodsmall, attorney for VPG Partners, VI, LLC, at dwoodsmall@fcplaw.com; Kenneth N. Hall, attorney for Royal Vista, LLC, at khall@rmpllp.com; and the Office of the Public Counsel at opcservice@ded.mo.gov this 15th day of March, 2012.

/s/ Rachel M. Lewis