

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

In the Matter of the Application of Missouri-
American Water Company for a Certificate
of Convenience and Necessity Authorizing it
to Install, Own, Acquire, Construct, Operate,
Control, Manage and Maintain a Sewer
System in an area of Jefferson County,
Missouri (Harbor View Estates)

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Case No. SA-2020-0073

**REQUEST FOR ADDITIONAL TIME
TO FILE A RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Request for Additional Time to File a Recommendation* in this matter hereby states:

1. Missouri-American Water Company (“MAWC”) filed its *Application and Motion for Waiver* on September 13, 2019, requesting a certificate of convenience and necessity (“CCN”) authorizing it to install, own, acquire, construct, operate, control, manage and maintain a sewer system in Jefferson County, Missouri, in a subdivision known as Harbor View Estates. MAWC also requested a waiver of the 60 day notice requirement contained in Commission Rule 20 CSR 4240-4.017(1).¹

2. On September 17, 2019, the Commission issued its *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation*, ordering Staff to file a recommendation regarding the application of Missouri-American Water Company, or a request for additional time to file a recommendation, no later than November 1, 2019.

¹ Effective August 28, 2019, all of the Commission’s regulations were transferred from the Department of Economic Development’s (“DED”) Title 4 to the Department of Commerce and Insurance’s (“DCI”)(formerly the Department of Insurance, Financial Institutions and Professional Registration) Title 20.

3. Staff is still in the process of conducting its investigation. While it has issued several data requests (“DRs”), to which MAWC has responded, information discovered in the course of Staff’s investigation requires further discussion with the company, and further events could result in a subsequent filing by the Company. Therefore, Staff requires additional time to complete its Recommendation.

4. To permit its continued investigation, Staff respectfully seeks additional time in which to complete its Recommendation, and requests the Commission order a new deadline of December 2, 2019.

5. Staff Counsel has discussed its request with counsel from MAWC, and the Company has indicated that it does not oppose an extension.

WHEREFORE, Staff prays that the Commission will accept this *Request for Additional Time to File a Recommendation*, and order Staff to file its Recommendation no later than December 2, 2019; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

Mark Johnson
Deputy Staff Counsel
Missouri Bar Number 64940
P.O. Box 360
Jefferson City, MO 65102
573-751-7431 (Voice)
573-751-9285 (Fax)
mark.johnson@psc.mo.gov

Attorney for Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record on this 31st day of October, 2019.

/s/ Mark Johnson