

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

In the Matter of Missouri-American Water)
Company's Application for a Certificates of)
Convenience and Necessity Authorizing it to)
Install, Own, Acquire, Construct, Operate,) **File No. SA-2021-0120**
Control, Manage and Maintain a Sewer)
System in and around the City of Taos, Missouri)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through the undersigned counsel, and for its *Status Report*, respectfully states as follows:

1. On October 28, 2020, Missouri-American Water Company ("MAWC") filed an *Application* with the Missouri Public Service Commission ("Commission") requesting a Certificate of Convenience and Necessity ("CCN") to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in and around Taos, Missouri.
2. On October 28, 2020, the Commission issued its *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff's Recommendation* directing Staff to file a recommendation or status report no later than December 10, 2020. On December 10, 2020, Staff filed its *Status Report* requesting additional time to file its recommendation and on December 11, 2020, the Commission issued its *Order Directing Filing* ordering Staff to file its recommendation no later than February 10, 2021.
3. As stated in Staff's *Status Report*, Staff issued several data requests ("DRs") and follow-ups to those data requests. MAWC has responded to all data requests and, at this point, nothing is pending from the company. While MAWC has responded to all Staff DRs in this matter, for cases of this type, Staff also typically requests certain information related to the system(s) being acquired from the Missouri Department of

Natural Resources (“DNR”). In this case, DNR was significantly delayed in providing Staff with responsive information. Due to this delay, as well as the need to commit Staff resources to the ongoing MAWC rate case, Case No. WR-2020-0344, Staff respectfully requests an extension to file its Recommendation to April 12, 2021, in order to properly analyze the information and, if necessary, conduct additional discovery.

WHEREFORE, Staff prays that the Commission will grant this *Motion for Extension*, and order Staff to file its Recommendation no later than April 12, 2021, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Ron Irving

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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 10th day of February, 2021.

/s/ Ron Irving