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)	Case No. SA-2010-0219
it to Acquire, Construct, Install, Own,)	
Operate, Control, Manage, and/or)	
Maintain a Sewer System for the public)	
in located Stone County, Missouri.)	

Response of Canyon Treatment Facility, LLC in Support of Staff's Motion for Expedited Consideration of the Joint Unanimous Stipulation and Agreement

Comes now Canyon Treatment Facility, LLC (Canyon) and for its Response in Support of Staff's Motion for Expedited Consideration of the Joint Unanimous Stipulation and Agreement states to the Missouri Public Service Commission (Commission) as follows:

- 1. Canyon agrees with and fully supports the Staff's Motion for Expedited Consideration.
- 2. In addition to the reasons stated in Staff's Motion, Canyon further states and requests that the Commission act expeditiously to approve the Joint Unanimous Stipulation and Agreement, such that the parties to the Agreement for Acquisition of sewer related assets and Treatment Agreement (Sale Agreement) referenced in Staff's Motion may close on this transaction on or after July 23, 2012.
- 3. On July 13, 2012, the governing board of the Stone County Sewer District No. 1 (Sewer District) met and finalized its arrangement with the United States Department of Agriculture to obtain the necessary funds to purchase all of the treatment plant and sewer related assets serving the Box Canyon Watershed. The Sewer District is now in a position to close on the Sale Agreement and a tentative closing date of July 23, 2012 has been established.
- 4. In order to be able to fully perform under the Sale Agreement, Canyon needs to obtain the necessary approval of the Missouri Public Service Commission and for such approval to be effective on or before July 23, 2012.
- 5. Canyon notes that the Commission has an agenda meeting scheduled for Tuesday, July 17, 2012. If possible, Canyon would suggest the Commission take this matter up at its agenda meeting and issue its Order Approving the Joint Unanimous Stipulation and Agreement and making said Order effective on July 23, 2012.

WHEREFORE, Canyon respectfully requests the Commission take all appropriate action to issue its Order Approving the Joint Unanimous Stipulation and Agreement and making such order effective no later than July 23, 2012.

Respectfully submitted,

/s/ W.R. England, III

W.R. England, III

Mo. Bar 23975

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ATTORNEYS FOR

CANYON TREATMENT FACILITY, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 13th day of July, 2012, to:

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