

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

In the Matter of the Application of Liberty )  
Utilities (Missouri Water), LLC d/b/a Liberty )  
Utilities to Acquire the Water and Sewer ) **File No. WA-2020-00174**  
Franchises and Assets of Lakeland )  
Heights Water Company, Oakbrier Water )  
Company, R.D. Sewer Company LLC, and )  
Whispering Hills Water System )

**MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and for its *Motion for Extension*, states as follows:

1. On February 6, 2020, Liberty Utilities (Missouri Water) LLC d/b/a Liberty Utilities (“Liberty Water”), filed an *Application* with the Missouri Public Service Commission (“Commission”) requesting the Commission approve its acquisition of the water and sewer franchises and assets of Lakeland Heights Water Company, Oakbrier Water Company, R.D. Sewer Company LLC, and Whispering Hills Water System (“Selling Utilities”).

2. On February 10, 2020, the Commission issued its *Order Directing Notice and Setting Dates for Submission of Intervention Requests and Staff Recommendation*; in its Order, the Commission directed Staff to file, no later than March 26, 2020, a recommendation regarding Liberty Water’s *Application*.

3. While Staff has issued a number of data requests in its review, has held discussions with Liberty Water and the Selling Utilities, and has reviewed the books and records of the utilities at issue in this matter, it has yet to finish its review of Liberty Water’s *Application*.

4. In addition, due to logistical issues between the parties, Staff has yet to complete its inspections of the Selling Utilities' systems. Due to the COVID-19 pandemic and the surrounding uncertainty it has caused, Staff is uncertain as to when it will be able to complete inspections of the selling systems. As an alternative, Staff is currently reviewing past inspection reports for the systems to determine if they can be used in finalizing its Recommendation.

5. To allow additional time for its review, and for potential coordination of inspections of the systems, Staff requests an extension of sixty (60) days to finalize and submit its Recommendation in this matter. Notwithstanding this request, Staff will aim to complete its Recommendation as soon as is practically possible.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension* for the Commission's information and consideration and hereby requests the Commission approve Staff's request for a sixty (60) extension, and order Staff to file its Recommendation no later than May 25, 2020.

Respectfully submitted,

**/s/ Mark Johnson**

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**Attorney for the Staff of the  
Missouri Public Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 24<sup>th</sup> day of March 2020.

**/s/ Mark Johnson**