

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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| In the Matter of Braden Park, LLC's Application |) | |
| for Certificate of Convenience and Necessity to |) | <u>File No. WA-2011-0260</u> |
| Provide Water Service. |) | |

**STAFF'S MOTION FOR EXTENSION OF TIME TO FILE AN AGREEMENT
IN LIEU OF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and files *Staff's Motion For Extension Of Time To File An Agreement In Lieu Of Recommendation (Motion)* with the Missouri Public Service Commission (Commission), respectfully stating the following:

1. On February 14, 2011, Braden Park, LLC (Braden Park or Applicant) filed an *Application For Certificate Of Convenience And Necessity To Provide Water Service (Application)* to Braden Park Village subdivision located in Benton County, Missouri.
2. On February 15, 2011, the Commission issued an Order that directed the filing of applications to intervene no later than March 7, 2011. The Commission received no such applications.
3. Subsequently, on March 8, 2011, the Commission issued an Order directing Staff to file its recommendation in this matter no later than April 7, 2011.
4. Since the filing of the *Application*, Staff has engaged in discussions with the Applicant. Staff and the Applicant wish to continue these discussions and believe a thirty (30) day extension will assist the parties in developing a potential resolution for the Commission's information and consideration in this matter.

WHEREFORE, Staff files this *Motion* and respectfully requests that the Commission allow until May 6, 2011, for Staff and the Applicant to file an agreement in lieu of a recommendation for the Commission's information and consideration in this matter.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez
Associate Staff Counsel
Missouri Bar No. 59814

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Missouri Public Service Commission
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Dale Shipley, attorney for Braden Park, LLC, at shiplaw@hotmail.com, and the Office of the Public Counsel at opcservice@ded.mo.gov and christina.baker@ded.mo.gov either by hand delivery, electronic mail, facsimile or First Class United States Mail, postage prepaid, this 7th day of April, 2011.

/s/ Jennifer Hernandez