BEFORE THE PUBLIC SERVICE COMMISSION 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.)	

Canyon Treatment Facility LLC's <u>Motion for Additional Time to respond to Staff Recommendation</u>

Comes now Canyon Treatment Facility, LLC (Canyon Treatment) and for its Motion for Additional Time to Respond to Staff's Recommendation filed in the above captioned matter, states to the Missouri Public Service Commission (Commission) as follows:

- 1. On January 21, 2010, Canyon Treatment filed an Application for Permission,
 Approval and a Certificate of Convenience and Necessity Authorizing it to Acquire, Construct,
 Install, Own, Operate, Manage and/or Maintain a Sewer System for the public in Stone County,
 Missouri.
- 2. On December 23, 2011, the Staff of the Missouri Public Service Commission (Staff) filed its Recommendation in this case. In its Recommendation, Staff requests, among other things, that the Commission grant Canyon Treatment a certificate of convenience and necessity and authorize the Staff to locate an interim receiver to take over the day-to-day operations. Attachment A to the Staff's Recommendation is a lengthy memorandum detailing all of Staff's Recommendations and reasons therefore. The Staff's Recommendation in this case is, to say the least, novel. But Canyon Treatment is willing to give it serious consideration. However, before Canyon Treatment can meaningfully respond to the Report, it has a number of

questions and/or concerns it would like to discuss with Staff regarding its recommended course of action.

3. Accordingly, Canyon Treatment requests an additional thirty (30) days to respond to Staff's Recommendation so that it may discuss, in more detail, Staff's proposal in this case.

Counsel for Canyon Treatment has discussed its request for an extension of time with Staff Counsel and Public Counsel and they have indicated no objection to this request.

WHEREFORE, Canyon Treatment respectfully requests the Commission grant it an additional thirty (30) days (i.e., until January 29, 2012) to respond to the Staff Recommendation, and for such other orders as are reasonable in the circumstances.

Respectfully submitted,

W.R. England

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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 30th day of December, 2011, to:

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