

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

Janice Shands,)	
)	
COMPLAINANT,)	
)	
v.)	Case No. WC-2015-0030
)	
Missouri-American Water Company,)	
)	
RESPONDENT.)	

**MAWC’S MOTION FOR EXTENSION OF TIME TO RESPOND
TO STAFF RECOMMENDATION
TO DISMISS COMPLAINT**

COMES NOW Missouri-American Water Company (MAWC or Company) and, as its Motion for Extension of Time to Respond to the Staff Recommendation to Dismiss Complaint, states as follows to the Missouri Public Service Commission (Commission):

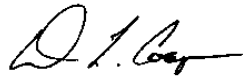
1. On September 4, 2014, MAWC filed its Answer and Response to Motion. Therein, among other things, MAWC suggested that this Commission has primary jurisdiction over the subject of this complaint -- what collection actions may be taken by MAWC; and, whether there may be discontinuation of service under existing circumstances, in light of the terms of MAWC’s tariff sheets and their application to 9953 Lewis & Clark.

2. On September 10, 2014, the Staff of the Commission (Staff) filed its Recommendation to Dismiss Complaint. The Staff Recommendation is based upon the fact that Complainant is not MAWC’s customer (the customer is Lewis & Clark Tower Condo Association 195, LLC). Therefore, Staff argues that “Complainant lacks standing to bring an action for relief in this Commission against a public utility of which they are not customers.” (Staff Rec., para. 5)

3. On September 19, 2014, counsel for Complainant filed two documents which appear to seek intervention on behalf of MAWC's customer - Lewis & Clark Tower Condo Association. Such participation by the Association would make Staff's Recommendation to Dismiss moot. Accordingly, MAWC seeks an extension of time to respond to the Staff's Recommendation to Dismiss until after such time as any issue concerning the Association's possible participation has been resolved.

WHEREFORE, Missouri-American Water Company prays the Commission grant it an extension of time to respond to the Staff's Recommendation to Dismiss until after the Commission has addressed the possible intervention of the Lewis & Clark Tower Condo Association.

Respectfully submitted,



Dean L. Cooper, Mo Bar No 36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166 (Telephone)
(573) 635-3847 (Fax)
dcooper@brydonlaw.com

//S// by dlc
Timothy W. Luft, MO Bar 40506
727 Craig Road
St. Louis, MO 63141
timothy.luft@amwater.com
(314) 996-2279 (telephone)
(314) 997-2451 (facsimile)

ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY

Certificate of Service

I hereby certify that copies of the foregoing have been transmitted by electronic mail to the following on this 19th day of September, 2014:

Cydney Mayfield
Missouri-Public Service Commission
Office General Counsel
staffcounsel@psc.mo.gov
cydney.mayfield@psc.mo.gov

Christina Baker
Missouri Office of the Public Counsel
opcservice@ded.mo.gov
Christina.baker@ded.mo.gov

Susan H. Mello
7551 Carondelet #403
Clayton, MO 63105
SusanMello@gmail.com

