BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of an Investigation into City Utilities of Springfield Plastic Pipe Failures and the Adequacy of its Leak Survey Procedures, Installation Procedures and Replacement Criteria

Case No. GS-2004-0257

STAFF'S REPLY TO THE COMMISSION'S ORDER TO RESPOND TO CITY UTILITIES OF SPRINGFIELD RESPONSE TO PSC STAFF RECOMMENDATIONS

COMES NOW the Staff of the Missouri Public Service Commission (Staff) by and through counsel, and in response to the Commission's April 18, 2007 Order Directing Filing states:

1. On April 16, 2007 City Utilities of Springfield responded to Staff's March 30, 2007 Status Report in which Staff recommended changes to City Utilities plastic pipe replacement program.

2. City Utilities objected to Staff's recommendations, noting constraints on their ability to comply with Staff's recommendations, including availability of personnel.

3. Various Staff members assigned to this case have been and are now out of the office conducting pipeline safety inspections. As a result, all of the Staff members assigned to the case have not had the opportunity to discuss City Utilities of Springfield's (the City's) response to the Staff's recommendations.

4. With the Commission's agreement, Staff requests additional time to discuss and formulate a reply to the City's April 16, 2007 response to address concerns with the progress of the program, and will file its Response with the Commission no later than May 10, 2007.

WHEREFORE, Staff requests the Commission permit Staff an extension of time, until May 10, 2007, for Staff to file its Response to City Utilities Response to Staff's Status Report and recommendations.

Respectfully submitted,

/s/ Lera L. Shemwell

Lera L. Shemwell Deputy General Counsel Missouri Bar No. 43792

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 26th day of April 2007.

/s/ Lera L. Shemwell