

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

In the Matter of an Investigation into City	)	
Utilities of Springfield Plastic Pipe	)	
Failures and the Adequacy of its Leak	)	Case No. GS-2004-0257
Survey Procedures, Installation	)	
Procedures and Replacement Criteria	)	

**STAFF'S RESPONSE TO THE  
COMMISSION'S ORDER TO FILE STATUS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) by and through counsel, and in response to the Commission's October 22, 2004 Order Directing Filing of a Status Report states:

1. On December 30, 2003, the Missouri Public Service Commission (Commission) issued its Order Establishing Case No. GS-2004-0257 (Order) for the purpose of conducting an investigation into the plastic mains and service lines used by City Utilities of Springfield (City Utilities).

2. In its Order, the Commission directed Staff to file a report in Case No. GS-2004-0257 by June 16, 2004.

3, On June 16, 2004, Staff filed its report in Case No. GS-2004-0257, which summarized Staff's investigation into City Utilities' plastic mains and service lines. The report contained Staff's recommendations and requested that the Commission issue an order directing City Utilities to file, within 60 days of the filing of Staff's report, a response regarding the recommendations contained in the report.

4. On August 16, 2004, City Utilities filed its response to the Staff's recommendations that were filed on June 16, 2004.

5. On September 10, 2004, the Commission directed Staff to file a Status Report no later than October 12, 2004, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system.

6. On October 12, 2004, the Staff filed its Status Report, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system. In its report, Staff proposed filing another status report on June 16, 2005.

7. On October 22, 2004, the Commission directed Staff to file another status report no later than June 16, 2005.

8. Staff has completed a review and analysis of City Utilities' semi-annual reporting to Staff and submits its Status Report attached as Exhibit A.

9. Staff recommends this case remain open to allow Staff to continue its investigation and to receive additional information from City Utilities.

10. The Commission has not issued an order directing City Utilities to comply with the Staff's recommendations. City Utilities has, however, agreed to accept Staff's recommendations and has been completing Staff's recommendations voluntarily without a Commission order.

**WHEREFORE**, Staff files this Status Report in response to the Commission's Order concerning Staff's monitoring, evaluation, and replacement of plastic pipe in City Utilities' system. The Staff also requests that the Commission leave this case open to receive additional information from City Utilities and additional reports from Staff. In addition, Staff requests that

the Commission advise Staff whether the Commission requires any additional information concerning City Utilities' compliance with the Staff's recommendations.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ Lera L. Shemwell**

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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 16<sup>th</sup> day of June 2005.

**/s/ Lera L. Shemwell**

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