

**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. On June 16, 2005, 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 summer of 2006.

9. On February 2, 2006, the Commission issued an ORDER ADOPTING STAFF'S RECOMMENDATIONS in which the Commission adopted the recommendations in Staff's June 16, 2004 report and ordered City Utilities of Springfield to comply with the recommendations as set out in Staff's June 16, 2004 report. Furthermore, the Commission ordered Staff to file a Status Report no later than June 30, 2006, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system.

10. Staff has completed a review and analysis of City Utilities' semi-annual reporting to Staff and submits its Status Report attached as Exhibit A. In this Status Report, the Staff recommended that another Status Report be filed in February/March 2007 covering City Utilities' activities the last half of 2006. Then, Staff recommends the Commission order require that subsequent reports be filed in February/March each year.

11. Attached is Staff's Status Report which is Exhibit A and includes an Appendix with the past eight recommendations.

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

WHEREFORE, Staff files this Status Report with Appendix in response to the Commission's Order concerning Staff's monitoring, evaluation, and replacement of plastic pipe in City Utilities' system. For the reasons noted above, the Staff requests that the filing date for the annual Status Report be changed to February/March, with the first report filed February/March 2007. The Staff further recommends that the Commission leave this case open to monitor the progress of City Utilities' pipe replacement program, and to receive additional information from City Utilities and additional reports from Staff.

Respectfully submitted,

/s/ Lera L. Shemwell

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 27th day of June 2006.

/s/ Lera L. Shemwell