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March 31, 2000

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Director, Utility Services

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Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED

MAR 31 2000

*Missouri Public
Service Commission*

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: WR-2000-281

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE AND REQUEST FOR EXPEDITED CONSIDERATION.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Keith R. Krueger
Deputy General Counsel
(573) 751-4140
(573) 751-9285 (Fax)

KK/jb
Enclosure
cc: Counsel of Record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 31 2000

Missouri Public
Service Commission

In the Matter of Missouri-American Water)
Company's Tariff Sheets Designed to)
Implement General Rate Increases for)
Water and Sewer Service Provided to)
Customers in the Missouri Service Area of)
the Company)

Case No. WR-2000-281

**JOINT MOTION TO MODIFY PROCEDURAL SCHEDULE
AND REQUEST FOR EXPEDITED CONSIDERATION**

COMES NOW Missouri-American Water Company, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel, the City of Mexico, Missouri, Public Water Supply District Nos. 1 and 2 of Andrew County, Missouri, Public Water Supply District No. 1 of DeKalb County, Missouri, Public Water Supply District No. 1 of Buchanan County, Missouri, the City of Warrensburg, Missouri, the City of O'Fallon, Missouri, the City of Weldon Spring, Missouri, the City of St. Peters, Missouri, St. Charles County, Missouri, Hawker Energy Products, Inc., Harmon Industries, Inc., Stahl Specialty Company, Swisher Mower and Machine Company, Inc., and Central Missouri State University, the Boeing Company, Ford Motor Company, Hussmann Refrigeration, and the St. Joseph Building and Construction Trades Council, all of whom are collectively referred to herein as "Joint Movants," and for their Joint Motion to Modify Procedural Schedule state to the Missouri Public Service Commission ("Commission") as follows:

1. On December 27, 1999, the Commission issued its Order Adopting Procedural Schedule. That Order, as corrected on December 28, 1999, provided, among other things, that Staff, OPC and intervenors would file direct testimony on all issues except rate design by no later than March 20, 2000, and on rate design by no later than March 23, 2000; that there would

be a prehearing conference on April 3-7, 2000; that all parties would file rebuttal testimony by April 27, 2000; that all parties would file surrebuttal testimony by May 25, 2000; and that an evidentiary hearing would be held June 5-9, 2000 and June 15-16, 2000. In a subsequent order issued February 1, 2000, the Commission ordered that a true-up hearing be held on June 26-29, 2000.

2. On March 14, 2000, the Commission issued its Order Extending Time for Filing Direct Testimony. In that Order, the Commission granted the moving parties' request that the deadline for filing direct testimony on all issues other than rate design be postponed to April 3, 2000, and that the deadline for filing direct testimony on rate design be postponed to April 6, 2000. The Commission did not change any of the other dates in the Procedural Schedule from those that are listed in Paragraph 1 hereof, but stated in its Order that "[f]urther requests for extensions necessitated by this extension will receive comparable consideration."

3. As a result of the foregoing, the remaining direct testimony is to be filed on April 3, 2000 and April 6, 2000, and the prehearing conference is scheduled to be held on April 3-7, 2000.

4. The Joint Movants unanimously agree that little would be gained by holding a prehearing conference before the parties have had an opportunity to review all of the direct testimony, and that the prehearing conference would be much more productive and beneficial and more likely to achieve its objectives if it is postponed by two weeks, to April 17-21, 2000.

5. The Joint Movants further unanimously agree that they will be better able to present all issues in this case to the Commission if all other remaining dates in the procedural schedule (except the dates for the true-up hearing) are also postponed by a commensurate amount of time, so that the evidentiary hearing would be held from June 15-23, 2000.

6. The Joint Movants further unanimously recommend that the dates for the true-up hearing not be changed, and that the true-up hearing be held June 26-29, 2000, as presently scheduled.

7. The Joint Movants note that the Commission presently plans to move to new office facilities during the last two weeks of June 2000, and that rescheduling the hearing in this case as requested may cause some inconvenience to the Commission. However the Joint Movants believe that the issues presented by this case are so important, and the need for all parties to fully prepare for the hearing on this case is so great, that the benefits of thus postponing the evidentiary hearing outweigh the inconvenience caused by setting the hearing on dates which coincide with the dates that the relocation of the Commission's offices is presently scheduled to occur.

8. The Joint Movants therefore request that the Commission enter its order modifying the remaining portions of the procedural schedule for this case as follows:

Direct testimony by Staff, Public Counsel and intervenors (all issues except rate design)	April 3, 2000
Direct testimony by Staff, Public Counsel and intervenors (rate design)	April 6, 2000
Prehearing conference	April 17-21, 2000
Parties informally agree on tentative list of issues (no filing required)	April 28, 2000
Rebuttal testimony of all parties	May 11, 2000
List of issues, list of witnesses, order of cross-examination	June 1, 2000
Surrebuttal testimony	June 8, 2000
Position statements of all parties	June 9, 2000
Evidentiary hearing on all issues except true-up	June 15-23, 2000
True-up hearing	June 26-29, 2000

9. The Joint Movants recognize that adoption of the foregoing procedural schedule would reduce, by one week, the length of time between the conclusion of the hearing (on all issues except true-up) and the operation of law dates for the tariffs filed by Missouri-American Water Company, and would limit the time available for the Commission to deliberate the important issues presented by this case. The Joint Movants therefore request that the Commission order that transcripts of the hearing be prepared on an expedited basis, so that the parties can submit their initial and reply briefs to the Commission soon after the conclusion of the evidentiary hearing in this case.

10. The Joint Movants further propose that all remaining testimony, together with supporting work papers, should be delivered to all other parties, either by personal delivery of hard copies, by electronic transmission, or through a next-day overnight delivery service, on the same day that it is filed.

11. The Joint Movants further propose that the time normally allowed for responding to data requests should be shortened, in order to allow the parties the best opportunity to fully and fairly present their cases to the Commission at the evidentiary hearing. The parties therefore request that the Commission order that, for all data requests that are propounded between April 3, 2000 and June 9, 2000, the party to whom the data request is presented shall answer the request within ten (10) days, instead of the twenty (20) days that are allowed by Rule 4 CSR 240-2.090(2), and that the Commission further order that if the recipient objects to a data request or is unable to answer it within ten (10) days, the recipient shall serve all of the objections or reasons for its inability to answer in writing upon the requesting party within seven (7) days after receipt of the data request, instead of the ten (10) days that are allowed by Rule 4 CSR 240-2.090(2).

12. Ag Processing, Inc., a cooperative, Friskies Petcare, a division of Nestle USA, Wire Rope Corporation of America, Inc., the City of Joplin, Missouri, and Public Water Supply

District No. 2 of St. Charles County, Missouri, are all parties to this case, but they are not included among the Joint Movants herein. The Staff represents to the Commission, however, that counsel for each of the said five parties has authorized the Staff to state to the Commission that their clients do not oppose this Motion.

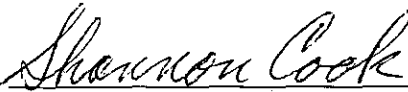
13. The City of St. Joseph, Missouri, is also a party to this case. Joint Movants have not been able to contact the attorney for the City of St. Joseph to ascertain whether he supports or opposes this Joint Motion.

14. The Joint Movants request that the Commission consider this Joint Motion on an expedited basis, so that the parties can promptly learn whether they will need to prepare for a prehearing conference beginning three days from today and whether they will need to change their plans for traveling to attend the prehearing conference.

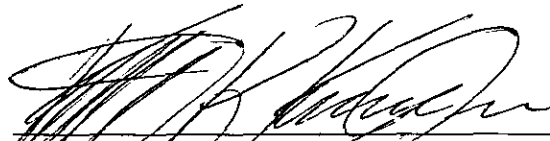
WHEREFORE, the Joint Movants respectfully request that the Commission modify the procedural schedule for this case in accordance with the dates set forth in Paragraph 8 hereof, and that it order that the transcripts of the evidentiary hearing in this case be prepared on an expedited basis.

Respectfully submitted,

DANA K. JOYCE
General Counsel



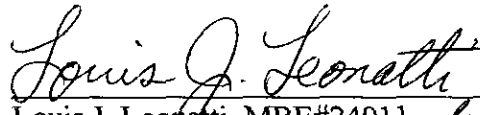
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Specialty Company, Swisher Mower and
Machine Company, Inc., and Central
Missouri State University

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 31st day of March 2000.



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