

**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 REPLY
TO RESPONSE OF CITY UTILITIES OF SPRINGFIELD

COMES NOW the Staff of the Missouri Public Service Commission (Staff) by and through counsel, and for its Reply to City Utilities of Springfield's Response 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. On May 10, 2007 Staff filed its response to City Utilities' objections/proposals in which Staff believed City Utilities should follow Staff's March 30, 2007 Recommendations with modifications.
4. On May 17, 2007 City Utilities responded to Staff's response in which they did not object to Staff's modified recommendations, with two exceptions, noting constraints on their ability to voluntarily replace extra pipe at a 50% rate and provide Staff with monthly updates.

5. Attached is Staff's Reply to City Utilities' Responses to Staff's modified Recommendations. Staff believes City Utilities should follow Staff's May 10, 2007 Modifications to Recommendations, with the exception and clarification as noted in Attachment A.

6. Staff has been and will continue to monitor the effectiveness of City Utilities' plastic main and service line replacement program and leak surveys. If at any time, Staff determines that the program requirements should be enhanced, it will immediately bring its concerns and recommendations to the Commission.

WHEREFORE, Staff requests the Commission order City Utilities to comply with Staff's recommendations concerning its pipe replacement program.

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, or transmitted by facsimile or electronic mail to all counsel of record this 18th day of June 2007.

/s/ Lera L. Shemwell
