BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

CHARLES HARTER, )

COMPLAINANT )

V. )CASE NO.WC2013-0468

)SMALL FORMAL COMPLAINT

MISSOURI AMERICAN WATER COMPANY, )

RESPONDENT )

COMPLAINANT’S OFFER OF GOOD CAUSE FOR SUBPOENA DUCES TECUM

COMES NOW complainant and for the good cause to support his request for Subpoena Duces Tecum, states that the very day the hearing was announced of 9-25 he contacted the Commission and requested testimony from CAASTL and was under the impression it would be arranged through the commission and thus did not request a subpoena until he was informed by the commission otherwise on 10-15-13

E MAIL FROM COMPLAINANT TO JENNIFER HERNANDEZ 9-25-13

I have spoken on the phone with Ms. Boyd at CAASTLE as to the possibility of a representative appearing at the hearing 10-18 to explain their organization procedures, which she says both the PSC and water company "already know", and she is checking their availability. I am hoping they could appear to help us with the record as a neutral witness.  If you would prefer some affidavit from CAASTLE to include in the stipulated issues I could consider that, but since both the agency and the hearing are in St. Louis, I think it should be convenient and helpful to produce it live, if possible, in case the judge has any questions which we have not thought of.  Thank you.

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