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September 26, 2001

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WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLILIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

FILED²

SEP 26 2001

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: Case No. WO-2002-17-In the Matter of the Application of the City of Hannibal, Missouri, and Public Water Supply District No. 1 of Ralls County, Missouri, for Approval of a Territorial Agreement Encompassing Part of Ralls County, Missouri.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **JOINT MOTION TO CANCEL PROCEDURAL SCHEDULE AND STAY PROCEEDINGS**.

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,

Victoria L. Kizito
(573) 751-6726 (Telephone)
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

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

FILED³
SEP 26 2001

In the Matter of the Application of the City)
of Hannibal, Missouri, and Public Water)
Supply District No. 1 of Ralls County,)
Missouri, for Approval of a Territorial)
Agreement Encompassing Part of Ralls)
County, Missouri.)

Case No. WO-2002-17

Missouri Public
Service Commission

JOINT MOTION TO CANCEL PROCEDURAL SCHEDULE AND STAY PROCEEDINGS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on its own behalf and on behalf of the City of Hannibal, Missouri ("City"), the Public Water Supply District No. 1 of Ralls County, Missouri ("District") and the Office of the Public Counsel ("OPC"), and in support of its Motion states:

1. On September 7, 2001, the Missouri Public Service Commission (Commission) issued its Order Adopting Procedural Schedule (effective September 17, 2001), with the first items, List of Issues or Stipulation and Agreement and Direct Testimony, due on October 1, 2001.
2. The parties originally agreed to a schedule falling close to the end of the 120-day period, prescribed in Section 247.172.3 RSMo. (2000), in which the Commission is prescribed to rule, in the hope that the parties would have time to resolve issues raised by the United States Department of Agriculture (USDA) with regard to the Territorial Agreement.
3. The USDA has not yet informed the parties of its specific concerns.
4. Pursuant to in Section 247.172.3 RSMo. (2000), the parties may request the Commission to rule on such applications later than one hundred twenty days after the application is properly filed with the secretary of the commission, for "good cause shown."

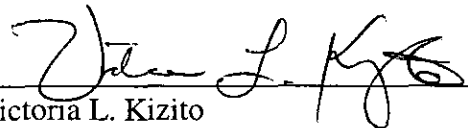
5. The application was filed with the secretary of the Commission on July 9, 2001, and the requisite 120-day time period ends on November 7, 2001.

6. Good cause to delay the Commission's ruling on the application exists, in that the parties need additional time to obtain the USDA's approval of the Territorial Agreement, and to resolve any other issues the parties may have, if possible.

WHEREFORE, the Parties jointly request that the Commission cancel the current procedural schedule and stay the proceedings until the USDA approves the Territorial Agreement, at which time the parties will file a jointly proposed procedural schedule.

Respectfully Submitted,

DANA K. JOYCE
General Counsel

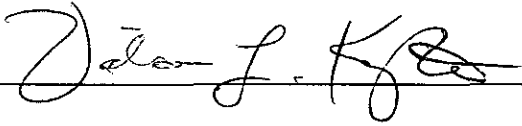


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Certificate of Service

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 26th day of September 2001.



Service List for

WO-2002-17

Revised: August 29, 2001 (cgo)

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