# DEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Dione C. Joyner,	)
Complainant,	)
-vs-	) Case No. WC-2006-0345
Missouri-American Water Company,	)
Respondent.	) )

## LATE FILED EXHIBIT OF MISSOURI-AMERICAN WATER COMPANY

Missouri-American Water Company ("Missouri-American" or the "Company"), by and through its attorney, Mary G. Sullivan, in response to a request at the evidentiary hearing for a late-filed exhibit related to the costs related to the excavation performed at 1422 Sheridan Drive, St. Louis, MO, states:

- 1. On October 13, 2006, the Missouri Public Service Commission held the evidentiary hearing in the above entitled case. At the conclusion of the hearing, Commissioner Appling requested that Missouri-American file as a late-filed exhibit any documentation related to the time spent by Missouri-American employees at the residence located at 1422 Sheridan Drive, St. Louis, MO in order to perform the excavation that was necessary to disconnect service for failure to pay.
- 2. Attached hereto and marked as Exhibit 8 are two documents responsive to this request. Page one is a copy of the timesheet completed by the Missouri-American crew for the work performed at this residence on October 14, 2006. This form indicates that the crew was at this location for four hours.

Pages two and three are a copy of the notice that is left at the residence by the crew after the excavation is completed. The form indicates that it was completed at 12:30 p.m. on October 14, 2006.

3. While Missouri-American's answer in this case indicated that service was terminated on October 13, 2005 based upon the work order issued on that date and admitted into the record of this case as Exhibit 6, the actual excavation and disconnection of service was performed on the following day, October 14, 2005.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

Mary G. Sullivan, #43030 Corporate Counsel

### ATTORNEY FOR MISSOURI-AMERICAN:

Mary G. Sullivan, Corporate Counsel Missouri-American Water Company 727 Craig Road St. Louis, MO 63141 Phone: (314) 996-2277

e-mail: mary.sullivan@amwater.com

# **VERIFICATION**

David Murphy, Network Operations Supervisor for the St. Louis County service area of Missouri-American Water Company, being first duly sworn, deposes and states that he is familiar with the documents attached as Exhibit 9 and the facts stated in the Late-Filed Exhibit pleading of Missouri-American Water Company, that said documents and facts are true and correct to the best of his knowledge, information and belief.

SUBSCRIBED and SWORN to before me this 20 th day of October, 2006.

otary Public

BRITTANY D. KOZAL Notary Public - Notary Seal State of Missouri - County of St. Louis My Commission Expires Feb. 16, 2010 Commission #06840521

## CERTIFICATE OF SERVICE

I, Mary G. Sullivan, do hereby certify that copies of the attached Late-Filed Exhibit of Missouri-American Water Company have been served upon the following, via electronic mail and US mail postage paid, this <u>20</u> th day of October, 2006:

Dione C. Joyner 1422 Sheridan Dr. St. Louis, MO 63132 Lewis R. Mills Jr. P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102

Secretary of the Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360 Jennifer Heintz General Counsel's Office P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102

General Counsel's Office P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102

May But