

FILED³

SEP 13 2000

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the Matter of Missouri-American)
Water Company's Tariff Sheets De-)
signed to Implement General Rate)
Increases for Water and Sewer Ser-)
vice provided to Customers in the)
Missouri Service Area of the Compa-)
ny)

WR-2000-281
SR-2000-282
(Consolidated)

MOTION TO EXPEDITE CONSIDERATION
OF APPLICATION FOR REHEARING
AND ALTERNATIVE APPLICATION FOR STAY
BY
GILSTER MARY-LEE CORPORATION

COME NOW GILSTER MARY-LEE CORPORATION and pursuant to Section 386.500.1 and 386.500.3 RSMo. 1994 moves that the Commission expeditiously consider and rule on its Application for Rehearing submitted herewith and its Application for Stay or in the Alternative That Rates Be Collected Under and Obligation of Refund and in support thereof states:

1. Gilster incorporates by reference all paragraphs of its Application for Rehearing filed contemporaneously herewith.
2. Gilster incorporates by reference all paragraphs of its Application for Stay or in the Alternative that Rates Be Collected Under an Obligation of Refund.
3. Failing prompt and immediate action by the Commission on its request for Rehearing and their Request for Stay, Gilster and other similarly situated ratepayers of the Joplin district will be required to pay funds to applicant utility and

may be unable to obtain refund of these funds in the event that part or all of the Report and Order of August 31, 2000 is vacated or set aside, or, failing such action by the Commission, is completely or partially overturned through judicial review.

4. Expeditious ruling on Gilster's Application for Rehearing is also sought so that the matter may be rectified, or, if the Commission is unwilling to set aside its erroneous and unlawful Order, so that prompt judicial review of the unlawful and erroneous decision may be taken by this petitioner.

5. Accordingly, the Commission should act to protect the interests of Gilster and other similarly situated captive ratepayers of the applicant utility by expeditiously ruling on Gilster's Application for Rehearing and their Application for Stay or in the Alternative that Rates Be Collected Under an Obligation of Refund.

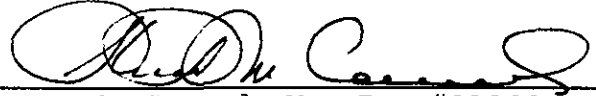
6. It is noted that, when the applicant utility sought expedited treatment of its Motion for Clarification, the Commission reacted promptly on such Motion and within less than one week. Accordingly, similar expedited treatment for this request by affected customers is sought from the Commission.

WHEREFORE for the foregoing reasons, Gilster seeks and requests expeditious rulings on its (1) Application for Rehearing and (2) its Application for Stay or in the Alternative that Rates Be Collected Under and Obligation of Refund, such expeditious

treatment measured by the expeditious consideration given by the Commission to the application utility's Motion for Clarification.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR GILSTER MARY-LEE
CORPORATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to the parties of record or their representatives as disclosed by the Commission's records in this proceeding.

Dated: September 13, 2000



Stuart W. Conrad