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*ALSO ADMITTED IN
KANSAS AND MASSACHUSETTS

November 16, 1999

FILED³

NOV 17 1999

FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
301 West High R530
Jefferson City, Missouri 65102

Missouri Public
Service Commission

Re: **Missouri-American Water Company**
Consolidated PSC Case Nos. WR-2000-281, SR-200-282

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) conformed copies of **SUPPORT OF MOTION TO EXTEND TIME FOR INTERVENTION**, which please file in the above matter and call to the attention of the Commission.

An additional copy of the **INITIAL PAGE** of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 
Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

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11/16/99 12:12pm

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

FILED³
NOV 17 1999

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)

SUPPORT OF MOTION
TO EXTEND TIME FOR INTERVENTION

Come now AG PROCESSING INC, A COOPERATIVE ("AGP"),
FRISKIES PETCARE, A DIVISION OF NESTLE USA ("Friskies") and WIRE
ROPE CORPORATION OF AMERICA INC. ("Wire Rope") and support the
motion of Cities of Warrensburg, O'Fallon and Weldon Spring to
Extend Time for Intervention and with respect thereto state:

1. The October 28, 1999 Order Suspending Tariffs
("Suspension Order") established the date of November 17, 1999
for the timely filing of interventions in this proceeding. That
order stated an effective date of November 9, 1999. These
entities timely filed applications to intervene on November 17,
1999.

2. The time period established by the Suspension
Order was twenty (20) days from its issuance, but only eight (8)
days from its effective date. It is not know when notices
pursuant to that order were mailed or issued, but intervenor Ag
Processing Inc was an active participant in the last several

cases filed by this utility yet has received no notification of the filing of this rate case.

3. 4 CSR 240-2.075(1) provides a period of thirty (30) days after the Commission issues its order giving notice of the case within which parties may intervene unless otherwise ordered by the Commission. No recitation of cause nor any request for a shortening of this period was indicated in the Suspension Order.

4. Customers of this utility require a reasonable time period within which to receive notification of its filing, analyze the notice received together with the filing, and obtain any additional information and needed authorizations in connection with intervention. Twenty days from the date of issuance of an order, a shorter period following the actual issuance of notices by the Commission, a still shorter period following receipt of the notices after anticipated mail delays from Jefferson City of three to seven days, simply results in an unreasonably short time for affected parties to address this filing.

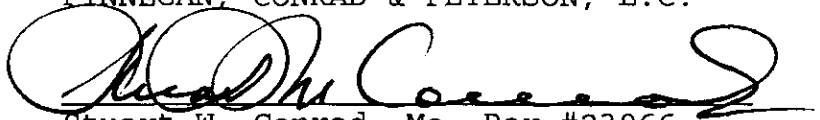
5. These parties believe that there are other larger customers of this utility that may wish to intervene and participate in some manner in this proceeding, but will be unable to do so on such short notice.

6. No possible harm can result from extending this time period. To the contrary, public benefit may result.

7. These parties would also suggest December 7, 1999 as a more appropriate date to which to extend leave to file timely interventions.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

A handwritten signature in dark ink, appearing to read "Stuart W. Conrad", is written over a horizontal line.

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ATTORNEYS FOR AG PROCESSING INC.,
FRISKIES PETCARE, A DIVISION OF
NESTLE USA and WIRE ROPE CORPORATION OF AMERICA, INC.

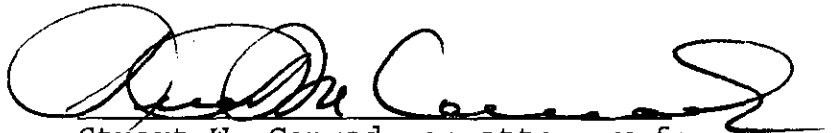
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application to Intervene by U.S. mail, postage prepaid addressed to the following persons:

Office of the Public Counsel
P. O. Box 7800
Jefferson City, MO 65102

Mr. William R. England
Brydon, Swearengen & England,
P.C.
312 East Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102-0456

Dated: November 16, 1999



Stuart W. Conrad, an attorney for
within applicants