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December 23, 1999

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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

FILED³

DEC 23 1999

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. WR-2000-281

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION FOR LEAVE TO LATE-FILE PROPOSED PROCEDURAL SCHEDULE.**

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,

Keith R. Krueger
Deputy General Counsel
(573) 751-4140
(573) 751-9285 (Fax)

KRK/mm
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

DEC 23 1999

Missouri Public
Service Commission

In the Matter of Missouri-American Water)
Company's Tariff Sheets Designed to)
Implement General Rate Increases for)
Water and Sewer Service Provided to)
Customers in the Missouri Area of the)
Company.)

Case No. WR-2000-281

**MOTION FOR LEAVE
TO LATE-FILE PROPOSED PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion for Leave to Late-File Proposed Procedural Schedule, states to the Missouri Public Service Commission ("Commission") as follows:

1. On September 1, 1998, the Commission issued its Suspension Order and Notice and Order Consolidating Cases, in which it ordered the parties to file a proposed procedural schedule on or before December 21, 1999. The said order further provided that Staff would have primary responsibility for preparing and filing the proposed procedural schedule.

2. The parties attended an early prehearing conference on December 14, 1999, as ordered by the Commission, and met for more than two hours to discuss issues the procedural schedule for this case. The parties reached tentative agreement on most of the issues surrounding the procedural schedule. However some issues remained, and the parties diligently continued to discuss the proposed procedural schedule for the next nine days. The parties finally reached agreement on all terms of the proposed procedural schedule on December 23, 1999.

3. The Staff was unable to complete preparation of a proposed procedural schedule on time, in part because of a temporary shortage of support staff to perform the work. The

Staff's secretarial support staff consists of five employees. On December 21, 1999, the date that the proposed procedural schedule was due, one of those employees was on annual leave, two were out sick, and one had a medical appointment that kept her out of the office all afternoon. This left only one employee, who was not able to prepare a proposed procedural schedule in addition to all of her other duties.

4. Furthermore, as of December 21, 1999, the parties had not yet reached agreement on the terms of the proposed procedural schedule. Staff's counsel did draft a non-unanimous proposal for filing on December 21, 1999. However, because of the disagreement among the parties at that time, if it had been filed, it would have resulted in the filing of multiple proposals, causing unnecessary delays and wasting resources.

5. The parties have now reached unanimous agreement on the terms of a Proposed Procedural Schedule, which is being offered for filing contemporaneously herewith. Acceptance of this late-filed Proposed Procedural Schedule will result in a more efficient processing of this case, on terms that are satisfactory to all parties.

WHEREFORE, the Staff respectfully requests that the Commission grant leave to file the Proposed Procedural Schedule after the filing deadline.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

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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 23rd day of December 1999.



**Service List for
Case No. WR-2000-281
December 23, 1999**

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