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Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.psc.state.mo.us August 21, 2000

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> DANA K. JOYCE General Counsel

AUG 2 1 2000

Missouri Public

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Service Commission

RE: Case No. WR-2000-281

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of STAFF'S MOTION FOR EXTENSION OF TIME TO FILE REVISED EXHIBIT.

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/dkf Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FILED³
AUG 2 1 2000

Missouri Public Service Commission

In the Matter of Missouri-American Water)	
Company's Tariff Sheets Designed to)	
Implement General Rate Increases for)	Case No. WR-2000-281
Water and Sewer Service Provided to)	Case No. w R-2000-281
Customers in the Missouri Service Area of)	
the Company)	

STAFF'S MOTION FOR EXTENSION OF TIME TO FILE REVISED EXHIBIT

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its Motion for Extension of Time to File Revised Exhibit, states to the Missouri Public Service Commission ("Commission") as follows:

- 1. On August 4, 2000, the Commission issued its Order Directing Filing, in which it ordered the Staff to submit a late-filed exhibit showing, among other things, the rate impact upon the ratepayers of Missouri-American Water Company ("Company") that result from the revenue requirement and rate design that the Staff proposed in this case. On August 15, 2000, the Staff filed a document in which it attempted to comply with the Commission's August 4, 2000 Order Directing Filing.
- 2. On August 17, 2000, the Commission issued another Order Directing Filing in which it ordered the Staff to revise the aforesaid late-filed exhibit to follow the format of the exhibit prepared and submitted by the Company. The Commission ordered the Staff to file the revised late-filed exhibit by not later than 3:00 p.m. on Monday, August 21, 2000.

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- 3. The Staff has worked diligently over the weekend to prepare a document that complies with the Commission's August 17, 2000 Order Directing Filing. However, due to computer problems that apparently resulted from moving the Commission's offices from the Harry S Truman Building to the Governor Office Building, the Staff has been unable to complete preparation of the revised exhibit as ordered by the Commission.
- 4. The Staff believes that it will be able to submit a revised exhibit showing the rate effects of its proposal according to district specific pricing by no later than 3:00 p.m. on Tuesday, August 22, 2000. However, the Staff states that it will not be able to show the rate effects according to single tariff pricing by that time, as directed by the Commission. The Staff did not propose single tariff pricing, so such an exhibit would not be based upon the Staff's proposal in this case, and it would probably not be based upon evidence that is already in the case, as the Commission ordered in its August 4, 2000 Order Directing Filing. Furthermore, the Staff estimates that it would take approximately two weeks to calculate the Staff's proposal so that it would be based on single tariff pricing, and to show the rate effects of such a proposal.

WHEREFORE, the Staff therefore requests the deadline by which it must file its revised late-filed exhibit be extended by one day, to 3:00 p.m., August 22, 2000.

Respectfully submitted,

DANA K. JOYCE General Counsel

Keith R. Krueger

Deputy General Counsel Missouri Bar No. 23857

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-4140 (Telephone) (573) 751-9285 (Fax)

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 21st day of August 2000.

Service List for Case No. WR-2000-281, et al. August 21, 2000

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