

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

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 Service Area)
of the Company.)

Case No. WR-2000-281
Case No. SR-2000-282

FILED
SEP 14 2000
Missouri Public
Service Commission

**MOTION FOR EXPEDITED TREATMENT AND
APPROVAL OF TARIFF SHEETS**

Comes now Missouri-American Water Company (MAWC or the Company) pursuant to 4 CSR 240-2.080(17) and for its Motion for Expedited Treatment and Approval of Tariff Sheets states to the Missouri Public Service Commission (Commission) as follows:

1. On August 31, 2000, the Commission issued its Report and Order in the above-referenced matter authorizing the Company to file proposed tariff sheets in compliance with the Report and Order. On September 12, 2000, the Commission issued its Order of Clarification further clarifying the way in which those tariffs were to be prepared.
2. Concurrent with the filing of this Motion (i.e., September 14, 2000), the Company is filing revised tariff sheets that comply with the Commission's Report and Order and its Order of Clarification. These tariff sheets bear an issue date of today (i.e., September 14, 2000) and are proposed to become effective on October 13, 2000; however, the Company requests that the Commission expedite its treatment and approval of these tariff sheets so that they may become effective on September 15, 2000, or as soon thereafter as possible.
3. It is appropriate for the Commission to expedite its treatment and approval of these tariffs because they are being filed in compliance with the Commission's Report and Order

and Order of Clarification. The Commission has found that the Company is currently experiencing a significant revenue deficiency (on the magnitude of approximately \$10.2 million annually) and thus current rates are insufficient to allow the Company to earn a reasonable return on its invested capital. This case was implemented by a revised tariff filing (pursuant to §386.150 RSMo. 1994) and the Commission suspended those tariffs for the full statutory period (i.e., 10 months). The operation of law date (giving recognition to the full suspension period) is September 15, 2000. If not the letter of the law, it is certainly the spirit of the law that a utility company should not have to wait more than eleven months after the filing of revised tariffs to implement a rate increase where the Commission has determined, after full investigation and hearing, that the Company's existing rates are inadequate. Accordingly, there is good cause for the Commission to expedite its treatment and approval of these tariffs.

4. This Motion is being filed as soon as it reasonably could have been filed since it is being filed concurrent with the tariffs and only two days after the Commission's issuance of its Order of Clarification.

WHEREFORE, in light of the foregoing, the Company respectfully requests that the Commission grant its motion to expedite treatment and approval of the tariff sheets and implement them on as soon as possible and on less than thirty days notice.

Respectfully submitted,



William R. England, II MBE#23975

Richard T. Ciottone MBE#21530

Dean L. Cooper MBE#36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

573/635-7166 (phone)

573/635-0427 (facsimile)

dcooper@brydonlaw.com (e-mail)

ATTORNEYS FOR MISSOURI-AMERICAN
WATER COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 14th day of September, 2000, to the following:

Mr. Keith Krueger
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Mr. Louis J. Leonatti
Leonatti & Baker, P.C.
P.O. Box 758
Mexico, MO 65265

Mr. James M. Fischer
Attorney at Law
101 West McCarty, Suite 215
Jefferson City, MO 65101

Mr. Leland B. Curtis
Curtis, Oetting, et al.
130 S. Bemiston, Suite 200
Clayton, MO 63105

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

Mr. Charles Brent Stewart
Stewart & Keevil, L.L.C.
1001 Cherry Street, Suite 302
Columbia, MO 65201

Mr. James B. Duetsch
Blitz, Bargette & Duetsch
308 E. High, Suite 301
Jefferson City, MO 65101

Mr. Karl Zobrist
Blackwell Sanders, et al.
P. O. Box 419777
Kansas City, MO 64141-9777

Mr. Joseph W. Moreland
Blake & Uhlig, P.A.
2500 Holmes Road
Kansas City, MO 64108

Mr. Stuart W. Conrad
Finnegan, Conrad & Peterson, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

Ms. Diana M. Vuylsteke
Bryan Cave LLP
One Metropolitan Sqr., Suite 3600
211 N. Broadway
St. Louis, MO 63102-2750

Mr. Jeremiah D. Finnegan
Finnegan, Conrad & Peterson, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

