

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 635-0427
Email: PAULB@BRYDONLAW.COM

DEAN COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
DALE T. SMITH
BRIAN K. BOGARD

OF COUNSEL
RICHARD T. CIOTTONE

November 2, 2001

FILED²
NOV 02 2001
Missouri Public
Service Commission

Mr. Dale Hardy Roberts, Secretary
Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, MO 65102-0360

**Re: In the Matter of the Proposed Acquisition of American Water Works
Company
Case No. WO-2002-206**

Dear Mr. Roberts:

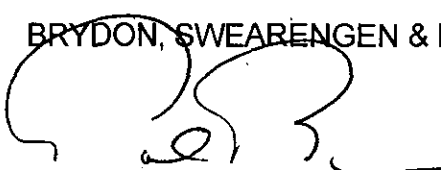
On behalf of Missouri-American Water Company, enclosed for filing in the above-referenced case please find an original and eight (8) copies of Motion for Extension of Time. A copy has also been hand-delivered to the Office of the Public Counsel this date.

Thank you for your assistance with this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:


Paul A. Boudreau

PAB/aw
Enclosures
cc: Office of the Public Counsel

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

FILED²
NOV 02 2001

In the Matter of the Proposed Acquisition)
of American Water Works Company by) Case No. WO-2002-206
the German Corporation RWE AG.)

Missouri Public
Service Commission

MOTION FOR EXTENSION OF TIME

COMES NOW Missouri-American Water Company ("MAWC") and requests an extension of time within which to respond to a motion filed by the Office of the Public Counsel ("OPC") which has been docketed by the Commission as captioned above. In support thereof, MAWC states that:

1. On October 25, 2001, OPC filed a Motion to Review Proposed Acquisition of Missouri-American Water Company and American Water Works Company, by RWE AG, a German Corporation (the "Motion"). In summary, OPC has requested that the Commission assert jurisdiction over an agreement pursuant to which RWE AG will purchase all of the outstanding shares of American Water Works Company, Inc. ("AWW"), the unregulated parent of MAWC. OPC requests that the Commission establish a procedural schedule and conduct a hearing to determine whether the transaction is detrimental to the public interest.

2. MAWC is interested in the subject matter of the Motion. OPC has alleged that the public interest is implicated because MAWC provides regulated water service in the State of Missouri. Consequently, MAWC requests an opportunity to respond to the Motion.

3. Absent a contrary order by the Commission, a response to OPC's Motion is due "not more than ten (10) days from the date of filing." 4 C.S.R. 240-2.080(16). The tenth day from the filing of the Motion is Sunday, November 4, 2001. Since that date falls on a weekend, the response is required to be filed the following day, Monday, November 5, 2001. See, 4 C.S.R. 240-2.050(1).

4. MAWC requests an extension of time within which to file a response to the Motion. Specifically, MAWC requests an extension of fifteen (15) days until Tuesday, November 20, 2001, for the filing of a response.

5. The additional time requested is necessary for counsel to notify parties in interest, consult with representatives of the parties to the transaction, to review and brief applicable law and prior Commission decisions, and to fully respond to the allegations contained in OPC's Motion.

6. The extension requested is reasonable and is not being made for the purpose of causing undue delay. The undersigned has discussed this request with attorneys for OPC and the Commission's Staff and has been authorized to represent that neither party opposes the extension of time herein requested.

WHEREFORE, for good cause shown, MAWC requests an extension of time until Tuesday, November 20, 2001, to respond to OPC's Motion in this cause.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'WR England, III', written over a horizontal line.

William R. England, III #23975

Paul A. Boudreau #33155

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102

Telephone: (573) 635-7166

Facsimile: (573) 635-0427

E-Mail: PaulB@brydonlaw.com

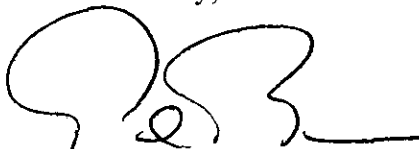
Attorneys for Missouri-American Water Company

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 2nd day of November, 2001, to:

Mr. Cliff Snodgrass
Deputy General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, MO 65102

Ms. M. Ruth O'Neill
Office of the Public Counsel
Governor Office Building
200 Madison Street
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read 'P. A. Boudreau', written over a horizontal line.

Paul A. Boudreau