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LELAND B. CURTIS

May 23, 2001

FILED²

MAY 24 2001

Missouri Public
Service Commission

Secretary of the Commission
Missouri Public Service Commission
200 Madison, Suite 100
Jefferson City, MO 65101

Re: St. Louis County Water Company, d/b/a Missouri-American Water Company
Cause No.: ~~WR~~-2001-288

WA-

Dear Secretary of the Commission:

Enclosed please find an original and nine (9) copies of Intervenor's Motion for Extension of Time to File Procedural Schedule in the above-referenced matter. Also enclosed is an additional copy to be filed-stamped and returned to me in the enclosed self-addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Leland B. Curtis

LBC/kw
Enclosures

cc: Parties of Record

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

FILED²

MAY 24 2001

*Missouri Public
Service Commission*

In the Matter of the Application of St. Louis)
County Water Company, d/b/a Missouri-)
American Water Company, for Restatement)
And Clarification of its Certificate of)
Convenience and Necessity for St. Louis)
County, Missouri)

Case No. WA-2001-288

**INTERVENORS' MOTION FOR
EXTENSION OF TIME TO FILE PROCEDURAL SCHEDULE**

Come now the Intervenor Cities of Winchester and Maryland Heights, the City of Chesterfield, the City of St. Ann, and the Cities and Villages of Ballwin, Bel-Nor, Bel-Ridge, Bella Villa, Bellerive, Bellefontaine Neighbors, Breckenridge Hills, Clayton, Cool Valley, Crestwood, Des Peres, Green Park, Hazelwood, Manchester, Maplewood, Normandy, Pasadena Hills, Pine Lawn, Richmond Heights, Riverview, Rock Hill, Town and Country, University City, Velda City, and Wildwood ("Intervenor Cities"), pursuant to 4CSR 240-2.080, and for their Motion for Extension of Time to File Procedural Schedule, state:

1. On February 7, 2001 Missouri American Water Company ("MAWC" or the "Company") filed in the instant case a pleading entitled "Unanimous Stipulation and Motion for Partial Settlement and Continuance of Remaining Issues" wherein MAWC and the municipal parties related that they were engaged in discussions regarding the lack of franchises in certain St. Louis County municipalities, needed additional time to resolve such issues, and requested a ninety day extension of time in which to file a proposed procedural schedule as mandated by ORDERED 3 of the Commission's Order of January 11, 2001.
2. On February 20, 2001, the Commission issued its Order Approving Stipulation and Agreement and, at ORDERED 4 directed the parties to file their proposed procedural schedule on or before May 31, 2001.

3. Intervenor Cities have been engaged in discussions with MAWC for several months in an attempt to negotiate a uniform franchise form acceptable to all of Intervenor Cities and to Company. Such negotiations appear to be productive and both Intervenor Cities and Company at this time believe that a franchise acceptable to all can be achieved.
4. Intervenor Cities need additional time in which to make certain that all of the concerns of the various Cities are addressed. Intervenor Cities have asked Company to agree to extend the May 31, 2001 deadline for filing the proposed procedural schedule until September 30, 2001. Company has agreed not to object to such continuance subject to the Intervenor Cities agreeing to the following condition:

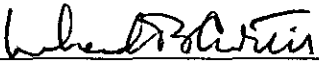
In the event that the Company enters into an agreement to acquire the water system assets of any municipality, and the Company has acquired a franchise from that municipality, the Intervenor Cities will not oppose a motion by the Company in this docket or any other for the grant of a Certificate of Convenience and Necessity from the Commission to serve that municipality.

5. Intervenor Cities are agreeable to this condition.
6. No other party should be prejudiced by Intervenor Cities' Motion .

WHEREFORE, Intervenor Cities request that the Commission grant their Motion For and Extension of Time to File Procedural Schedule in the instant proceeding until September 30, 2001.

Respectfully submitted,

Cities of Ballwin, et al.



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Certificate of Service

Copies of the foregoing have, on the date below written, been sent to all parties of record, including the Office of Public Counsel and the General Counsel to the Commission, by prepaid U.S. Mail.



Leland B. Curtis

May 23, 2001

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