

FILE³

SEP 13 2000

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the Matter of Missouri-American)
Water Company's Tariff Sheets De-)
signed to Implement General Rate)
Increases for Water and Sewer Ser-)
vice provided to Customers in the)
Missouri Service Area of the Compa-)
ny)

WR-2000-281
SR-2000-282
(Consolidated)

MOTION TO EXPEDITE CONSIDERATION
OF APPLICATION FOR REHEARING
AND ALTERNATIVE APPLICATION FOR STAY
BY

AG PROCESSING INC, A COOPERATIVE,
FRISKIES PETCARE, A DIVISION OF NESTLE USA
WIRE ROPE CORPORATION OF AMERICA INC. AND"
CITY OF RIVERSIDE, MISSOURI

COME NOW AG PROCESSING INC, A COOPERATIVE ("AGP"),
FRISKIES PETCARE, A DIVISION OF NESTLE USA ("Friskies") and WIRE
ROPE CORPORATION OF AMERICA INC. ("Wire Rope") and City of
Riverside, Missouri ("Riverside") (collectively hereafter "Inter-
venors") and pursuant to Section 386.500 RSMo. 1994 move that the
Commission expeditiously consider and rule on their Application
for Rehearing submitted herewith and their Application for Stay
or in the Alternative That Rates Be Collected Under and Obliga-
tion of Refund and in support thereof state:

1. Intervenors incorporate by reference all para-
graphs of their Application for Rehearing filed contemporaneously
herewith.

2. Intervenors incorporate by reference all para-
graphs of their Application for Stay or in the Alternative that
Rates Be Collected Under an Obligation of Refund.

3. Failing prompt and immediate action by the Commission on their request for Rehearing and their Request for Stay, ratepayers of the St. Joseph district and in the Parkville district will be required to pay funds to applicant utility and may be unable to obtain refund of these funds in the event that part or all of the Report and Order of August 31, 2000 is vacated or set aside, or, failing such action by the Commission, is completely or partially overturned through judicial review.

4. Expeditious ruling on these Intervenor's Application for Rehearing is also sought so that the matter may be rectified, or, if the Commission is unwilling to set aside its erroneous and unlawful Order, so that prompt judicial review of the unlawful and erroneous decision may be taken by these Intervenor's.


5. Accordingly, the Commission should act to protect the interests of captive ratepayers of the applicant utility by expeditiously ruling on these Intervenor's Application for Rehearing and their Application for Stay or in the Alternative that Rates Be Collected Under an Obligation of Refund.

6. It is noted that, when the applicant utility sought expedited treatment of its Motion for Clarification, the Commission reacted promptly on such Motion and within less than one week. Accordingly, similar expedited treatment for this request by affected customers is sought from the Commission.

WHEREFORE for the foregoing reasons, these Intervenor
seek and request expeditious rulings on their (1) Application for
Rehearing and (2) their Application for Stay or in the Alterna-
tive that Rates Be Collected Under and Obligation of Refund, such
expeditious treatment measured by the expeditious consideration
given by the Commission to the application utility's Motion for
Clarification.


Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR CITY OF RIVERSIDE,
MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to the parties of record or their representatives as disclosed by the Commission's records in this proceeding.

Dated: September 13, 2000



Stuart W. Conrad