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December 14, 1999

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ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

RE: WR-2000-281

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF'S MOTION FOR LEAVE TO LATE-FILE RESPONSE TO MISSOURI-AMERICAN WATER COMPANY'S MOTION FOR ACCOUNTING AUTHORITY ORDER.**

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)

KK/jb
Enclosure
cc: Counsel of Record

FILED²

DEC 14 1999

Missouri Public
Service Commission

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

FILED²
DEC 14 1999
Missouri Public
Service Commission

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 Area of the)
Company.

Case No. WR-2000-281

**STAFF'S MOTION FOR LEAVE TO LATE-FILE
RESPONSE TO MISSOURI-AMERICAN WATER COMPANY'S
MOTION FOR ACCOUNTING AUTHORITY ORDER**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion for Leave to Late-File Response to Missouri-American Water Company's Motion for Accounting Authority Order; states to the Missouri Public Service Commission ("Commission") as follows:

1. On November 19, 1999, Missouri-American Water Company ("Company") filed its Motion for Accounting Authority Order. The Company requested that the Commission issue an AAO that would authorize the company to continue the capitalization of Allowance for Funds Used During Construction ("AFUDC") during construction of a new water treatment plant at St. Joseph, Missouri, and would authorize the Company to use a rate of 7.22% to capitalize AFUDC on the St. Joseph treatment plant.

2. Commission Rule 4 CSR 240-2.080 (12) provides that parties shall be allowed ten days from the date of filing to respond to any motion or other pleading unless otherwise ordered by the Commission. Responses to the said motion were therefore due on November 29, 1999.

3. Ag Processing Inc., a cooperative, Friskies Petcare, a division of Nestle USA, and Wire Rope Corporation of America Inc. filed a timely response to the Company's motion on

November 29, 1999, and the Office of the Public Counsel also filed a timely response to the Company's motion on November 29, 1999.

4. Due to the intervention of the Thanksgiving holiday and the press of other business, including an evidentiary hearing before the Commission in another case, the Staff was not able to file a timely response to the Company's motion.

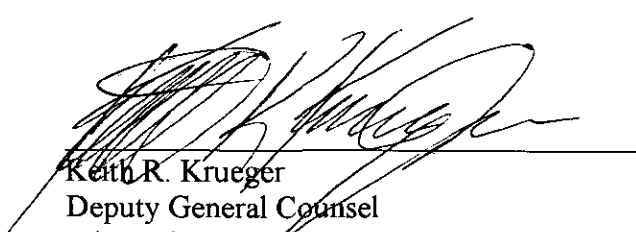
5. The Staff believes that the Commission will benefit by being able to consider the Staff's position on this important matter, and therefore requests leave to late-file a response in opposition to the Company's Motion for Accounting Authority Order.

6. No party will be harmed by the late filing of the Staff's response to the Company's motion.

WHEREFORE, the Staff respectfully requests that the Commission grant the Staff leave to late-file its response to the Company's Motion for Accounting Authority Order.

Respectfully submitted,

DANA K. JOYCE
General Counsel

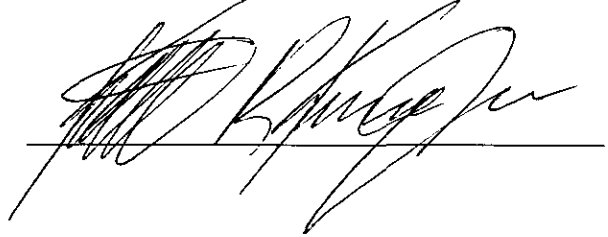


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Missouri Bar No. 23857

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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 14th day of December 1999.



**Service List for
Case No. WR-2000-281
December 14, 1999**

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