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April 6, 2000

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FILED

APR 6 2000

Missouri Public
Service Commission

RE: WR-2000-281, et al.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **STAFF'S MOTION TO LATE-FILE SCHEDULES TO BE ATTACHED TO DIRECT TESTIMONY OF STAFF WITNESS WENDELL R. HUBBS.**

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
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KK/jb
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

APR 6 2000

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 Service Area of)
the Company)

Case No. WR-2000-281, et al.

**STAFF'S MOTION TO LATE-FILE SCHEDULES TO BE ATTACHED
TO DIRECT TESTIMONY OF STAFF WITNESS WENDELL R. HUBBS**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion for Leave to Late-File Schedules to be Attached to Direct Testimony of Staff Witness Wendell R. Hubbs ("Hubbs"), states to the Commission as follows:

1. On December 27, 1999, the Missouri Public Service Commission ("Commission") issued an Order Adopting Procedural Schedule. That Order, as subsequently modified, provided, among other things, that Staff, the Office of the Public Counsel, and intervenors would file direct testimony on all issues except rate design by no later than April 3, 2000, and that they would file their direct testimony on rate design issues by no later than April 6, 2000.

2. The Staff timely filed its direct testimony on all issues except rate design on April 3, 2000, and timely filed the rate design testimony of Hubbs, its sole rate design witness, on April 6, 2000. However, due to the press of other business, Staff Witness Hubbs was not able to complete the preparation of the schedules that are to be attached to his direct testimony regarding rate design, and to which he referred in his direct testimony. Staff Witness Hubbs states that he

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expects that he will be able to complete his schedules and file them with the Commission within five to six business days.

3. The Staff believes that other parties to this case will not be harmed by the delay in filing the schedules that are to be attached to the testimony of Staff Witness Hubbs. The Staff believes that the most significant rate design issue in this case, and one of the most significant issues in the case overall, is the question of whether "single tariff pricing" or "district specific pricing" should be employed. Staff witness Hubbs makes clear in his testimony that the Staff is proposing "district specific pricing" in this case. The Staff contends that it is the Staff's overall position on this issue that is of critical interest to the other parties in this case, and that the absence of the data that will be contained in the late-filed schedules will not impede any party's ability to prepare for the hearing in this case, if they are filed by no later than Friday, April 14, 2000. The Staff further notes that the data from which the schedules will be derived has already been filed with the Commission, either as part of the Company's direct testimony, or as *accounting schedules to the Staff's direct testimony.*

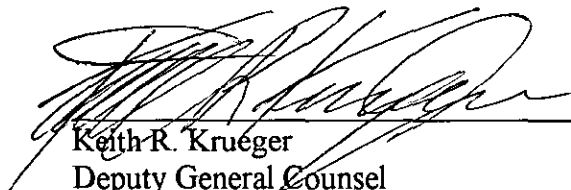
4. The Staff further proposes to either file with the Commission, or provide to the other parties, the schedules that it prepares for each of the Company's districts, as they become available. The Staff believes this will assist the other parties, because the Staff will utilize the same methodology for all districts, and the Staff believes the other parties will benefit from seeing the schedules from each of the districts as they becomes available.

5. The Staff apologizes for any inconvenience this short delay may cause the Commission or any of the other parties to this case.

WHEREFORE, the Staff respectfully requests that the Commission grant the Staff leave to late-file the schedules that are to be attached to the direct testimony of Staff Witness Hubbs.

Respectfully submitted,

DANA K. JOYCE
General Counsel

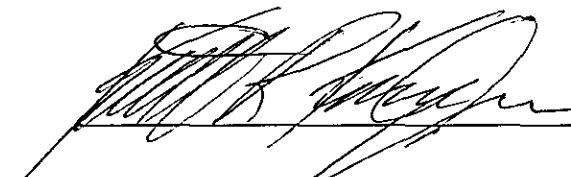


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Certificate of Service

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 6th day of April 2000.



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Case No. WR-2000-281 and SR-2000-282
April 6, 2000**

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