



John B. Coffman
Acting Public Counsel

State of Missouri

Bob Holden
Governor

Office of the Public Counsel
Governor Office Building
200 Madison, Suite 650
P.O. Box 7800
Jefferson City, Missouri 65102

Telephone: 573-751-4857
Facsimile: 573-751-5562
Web: <http://www.mo-opc.org>
Relay Missouri
1-800-735-2966 TDD
1-800-735-2466 Voice

March 7, 2002

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

**Re: Missouri-American Water Company
Case No. WO-2002-273**

FILED
MAR 07 2002
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies **Joinder in Motion to Extend Procedural Schedule**. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

M. Ruth O'Neill
Assistant Public Counsel

MRO:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAR 07 2002
Missouri Public
Service Commission

In the Matter of the Joint Application of Missouri-)
American Water Company, St. Louis County Water)
Company, d/b/a Missouri-American Water Company,)
and Jefferson City Water Works, d/b/a Missouri-) Case No. WO-2002-273
American Water Company, for an Accounting)
Authority Order Relating To Security Costs.)

JOINDER IN MOTION TO EXTEND PROCEDURAL SCHEDULE

COMES NOW, the Office of the Public Counsel, and respectfully joins the
Motion to Extend Procedural Schedule previously filed by the Applicant in this case.

This motion is made for the following reasons:

1. The parties have had an ongoing disagreement regarding a number of
discovery issues in this matter.

2. The Applicants in this case recently agreed to bring disputed discovery
information to its office in Jefferson City, Missouri, for Public Counsel and members of
the Commission's staff to review. Public Counsel and Staff members have reviewed the
available information at this location. The Applicants have made some of the disputed
discovery information available for copying, and some for "limited note-taking."
However, the discovery process has not yet progressed to the point where Public Counsel
believes that it can file complete rebuttal testimony.

3. Because the Applicants are now providing information which allows Public
Counsel to evaluate the AAO proposal, Public Counsel believes it would be appropriate
to extend the procedural schedule in order for complete rebuttal testimony to be filed in
this matter.

34

4. Public Counsel did not oppose the Applicant's request to extend the procedural schedule because Public Counsel had not received information that was necessary in order for Public Counsel to provide well-reasoned, thoughtful rebuttal testimony in this case which addresses the merits of the Applicant's request. Now that the discovery process is moving along, it would be appropriate to allow Public Counsel 30 days from today in which to prepare and file rebuttal testimony in this matter.

WHEREFORE, it is respectfully requested that the Commission grant the previously filed Motion to Extend Procedural Schedule, and allow Public Counsel and the Staff an additional 30 days in which to file rebuttal testimony in this case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: 

M. Ruth O'Neill (#49456)

Assistant Public Counsel

P O Box 7800

Jefferson City, MO 65102

(573) 751-1304

(573) 751-5562 FAX

Email: roneill1@mail.state.mo.us

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 7th day of March 2002:

VICTORIA L KIZITO

Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102
Attorney for Staff
vkizito@mail.state.mo.us

DEAN L COOPER

Brydon Swearengen & England PC
312 E Capitol Avenue
PO Box 456
Jefferson City MO 65102
Attorney for Applicant
dcooper@brydonlaw.com

DAVID P ABERNATHY

Missouri-American Water Company
535 N New Ballas Road
St Louis MO 63141
Attorney for Applicant
dabernathy@slewc.com

STUART CONRAD

Finnegan Conrad & Peterson
1209 Penntower Office Center
3100 Broadway
Kansas City MO 64111
Attorney for St. Joseph Industrial
stucon@fcplaw.com

JAMES B DUETSCH

Blitz Bardgette & Duetsch
308 E High Street
Suite 301
Jefferson City MO 65101
City of Joplin, Missouri

JEREMIAH D FINNEGAN

Finnegan Conrad & Peterson
1209 Penntower Office Center
3100 Broadway
Kansas City MO 64111
Attorney for City of Riverside, Missouri


Mark A. Orville