1100 Frederick Avenue, St. Joseph, Missouri 64501

January 4, 2000

FILED

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65101

Missouri Public

Re: Missouri-American Water Company - Case No.: WR-2000-281 - Tariff No.: 200000366

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the City's "Motion for Local Public Hearing." Please stamp the extra copy "filed" and return it to me in the self-addressed, stamped envelope.

If you have any questions, please feel free to contact me.

City Attorney

LMR:scs

## **Enclosures**

cc: Larry Stobbs, Mayor
Stet Schanze, City Manager
Pam Windsor, Assistant City Manager
Vince Capell, Director of Finance
Bruce Woody, Director of Public Works & Transportation
All parties indicated on "Certificate of Service"

## STATE OF MISSOURI PUBLIC SERVICE COMMISSION



		Sen Souri Public
IN THE MATTER OF MISSOURI-	)	Service Commission
AMERICAN WATER COMPANY'S	)	
TARIFF SHEETS DESIGNED TO	)	
IMPLEMENT A GENERAL RATE	)	Case No.: WR-2000-281
INCREASE FOR WATER SERVICE	)	Tariff No.: 200000366
PROVIDED TO CUSTOMERS IN THE	)	
MISSOURI SERVICE AREA OF THE	)	
COMPANY.	)	

## MOTION FOR LOCAL PUBLIC HEARING

COMES NOW the City of St. Joseph, Missouri, a constitutional charter city organized under Article VI, Sections 19 and 20, of the Constitution of the State of Missouri, and hereby moves this Body for an Order granting a public hearing to be held in the City of St. Joseph, Missouri, and in support of its Motion states as follows:

- 1. That the Missouri-American Water Company is a corporation duly organized and furnishing water services within the City of St. Joseph, Missouri; and
- 2. That the Missouri-American Water Company has petitioned the Public Service Commission for a general rate increase for water service provided to customers in the Missouri service area; and
- 3. That the residents of the City of St. Joseph, Missouri, are water users who have a direct and vital interest in the services provided and the rates charged by Missouri-American Water Company within the City of St. Joseph, Missouri; and
- 4. That the principles of fairness and equity require that the residents of the City of St. Joseph, Missouri be afforded an opportunity to be heard and participate in the above-referenced matter.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests an Order of this Body granting a public hearing to be scheduled at the convenience of the Body and held within the City of St. Joseph, Missouri, and other such relief as the Body deems just and proper in the premises.

Respectfully submitted,

ST. JOSEPH CHTY ATTORNEY'S OFFICE

#40041

#45782

#46789

By: Lisa M. Robertson

Lisa M. Robertson Brian W. Head (Asst.)

Timothy L Kissock (Asst.)

City Hall -- Room 307 1100 Frederick Avenue St. Joseph, Missouri 64501 Telephone: (816) 271-4680

Telefax: (816) 271-4737

## CERTIFICATE OF SERVICE

I hereby certify that on this 4<sup>th</sup> day of January, 2000, a copy of the foregoing "Motion for Local Public Hearing" was mailed by me, first-class postage prepaid, to:

Office of the Public Counsel P. O. Box 7800 Jefferson City, Missouri 65102

General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102

Chuck D. Brown 303 East Third Street P. O. Box 1355 Joplin, Missouri 64802-1355

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Soule, P.C.
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Louis J. Leonatti Leonatti & Baker, P.C. 123 East Jackson Street, P. O. Box 758 Mexico, Missouri 65265

Charles Brent Stewart Stewart & Keevil, L.L.C. 1001 Cherry Street, Suite 302 Columbia, Missouri 65201

Diana M. Vuylsteke One Metropolitan Square, Suite 3600 211 North Broadway St. Louis, Missouri 63102-2750

Martin W. Walter/Joseph W. Moreland Blake & Uhlig, P.A. 2500 Holmes Road Kansas City, Missouri 64108