



Martha S. Hogarty

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

December 26, 2001

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**

Dear Mr. Roberts:

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

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Ruth O'Neill".

M. Ruth O'Neill  
Assistant Public Counsel

MRO:jb

cc: Counsel of Record

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

In the Matter of the Joint Application	)	
of Missouri-American Water Company,	)	
St. Louis Water Company, d/b/a Missouri-	)	
American Water Company and Jefferson	)	Case No. WO-2002-273
City Water Works, d/b/a Missouri-American	)	
Water Company for an accounting authority	)	
order relating to security costs.	)	

**RESPONSE TO PROPOSED PROCEDURAL SCHEDULE**

COMES NOW, the Office of the Public Counsel (Public Counsel), and respectfully responds to the Proposed Procedural Schedule submitted by counsel on behalf 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-American Water Company (together, the Applicants or the Companies). Public Counsel concurs with the Applicants' decision to withdraw their request that the Commission grant this application expedited treatment.

Public Counsel has reviewed the proposed procedural schedule submitted by the Applicants and, subject to the following proposed modifications, has no objections to the Commission adopting the Applicants' proposed procedural schedule:

January 31, 2001	Applicants file direct testimony
February 28, 2002	All other parties (who wish to do so) file rebuttal testimony
March 21, 2002	Surrebuttal and Cross-Surrebuttal testimony (all parties wishing to file)
March 28, 2002	Statement of Issues
April 4, 2002	Statement of Positions

2

April 30-May 1 (if dates are available)

Evidentiary Hearing

May 16 (or 15 days after the conclusion of the hearing)

Initial Briefs

May 30 (or 15 days after the filing of initial briefs)

Reply Briefs

Public Counsel expects that the discovery process will continue throughout January and February 2002, and will be ongoing throughout the course of this proceeding, as necessary. Depending on the dates on which the hearing is scheduled, the above schedule should enable the Commission to reach a decision on this matter in June 2002. Public Counsel believes that the Staff of the Commission is also amenable to this or a similar schedule.

WHEREFORE, it is respectfully requested that this Commission allow the Applicants to withdraw their request for expedited treatment in this case, and to order the procedural schedule as set forth above.

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

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 26<sup>th</sup> day of December 2001:

**GENERAL COUNSEL**

Missouri Public Service Commission  
P O Box 360  
Jefferson City MO 65102

**JAMES B DUETSCH**

Blitz Bardgette & Duetsch  
308 E High Street  
Suite 301  
Jefferson City MO 65101

**DEAN COOPER**

Brydon Swearengen England PC  
P O Box 456  
Jefferson City MO 65102  
Attorneys for MAWC & AWWC

**STUART CONRAD**

Finnegan Conrad & Peterson LC  
3100 Broadway  
Suite 1209  
Kansas City MO 64111

A handwritten signature in cursive script, appearing to read "Stuart Conrad", is written over a horizontal line.