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

In the Matter of Missouri-American Water	)	
Company for Authority to File Tariffs )		
Reflecting Increased Rates for Water	)	Case No. WR-2003-0500
and Sewer Services.	)	

## ST. JOSEPH WATER RATE COALITION RESPONSE TO MOTION TO SET LOCAL PUBLIC HEARINGS AND STAFF RECOMMENDATION

The St. Joseph Water Rate Coalition ("St. Joseph WRC") hereby states the following in response to the Motion to Set Local Public Hearings filed by the Office of the Public Counsel ("OPC"), and the Staff Recommendation Regarding Local Public Hearings:

- In its motion, OPC recommended that the Commission schedule a local public hearing in
   St. Joseph for the evening of Wednesday, September 10, 2003.
- 2. However, Staff's Recommendation suggested that dates for St. Joseph, Parkville, Mexico, Jefferson City and Joplin be set in October for two reasons. First, Staff properly observed that these service areas will be the most affected by the proposed rate increase in this case. Secondly, customers in these areas will be most interested in the Staff's position on the appropriate revenue requirement for applicant Missouri-American Water Company ("MAWC"). Staff's testimony on all issues except rate design is to be filed October 3, 2003. Rate design testimony must be filed by October 10, 2003.
- 3. Although Staff requested that the hearing in St. Joseph occur on October 7, the St. Joseph WRC respectfully requests that the hearing in St. Joseph be scheduled several days after the rate design testimony is filed.

KC-1109607-1

- 4. Clearly, customers in St. Joseph are concerned not only with the revenue requirement, but also the method of recovery or rate design.
- 5. The St. Joseph WRC is made up of business in both the Industrial and Commercial classes, including such employers as AG Processing, Inc., Johnson Controls, Phoenix Scientific, Inc., Wire Rope Corporation, and Heartland Health, the major medical center between Kansas City and Omaha. The Coalition also includes members of the Other Public Authority customer group, such as the City of St. Joseph, the St. Joseph School District, Buchanan County, and Missouri Western State College.
- 6. Because both the revenue requirement issues and the rate design issues can equally and substantially affect the interests of the members of the Coalition and their employees, who are members of the Residential customer class, it is essential that the local public hearing in St. Joseph be scheduled at a time after Staff submits its rate design testimony on October 10.

WHEREFORE, the St. Joseph WRC requests that the local public hearing in St. Joseph be scheduled during the week of October 13, 2003, after Staff has filed its direct testimony in this case.

/s/ Karl Zobrist

Karl Zobrist

MO #28325

Teresa Brown

MO #49424

Blackwell Sanders Peper Martin LLP

2300 Main Street, Suite 1100

Kansas City, Missouri 64108

(816) 983-8000

(816) 983-8080 (FAX)

kzobrist@blackwellsanders.com

Attorneys for St. Joseph Water Rate Coalition

Dana K. Joyce

Cliff Snodgrass

P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102

Jere Buckman 200 Madison Street, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

John B. Coffman Ruth O'Neill P.O. Box 7800 200 Madison Street, Suite 640 Jefferson City, MO 65102

Jan Bond Diekemper, Hammond, Shinners, Turcotte & Larrew, P.C. 7730 Cardondelet Avenue, Suite 200 St. Louis, MO 63105

W.R. England III
Dean L. Cooper
Brydon Swearengen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102

Lisa C. Langeneckert 720 Olive Street, Suite 2400 St. Louis, MO 63101-2313

Mark W. Comley City Attorney 320 East McCarty Street Jefferson City, MO 65101 Jeffrey A. Keevil Stewart & Keevil 1001 Cherry Street, Suite 302 Columbia, MO 65201

Gail M. Wells 720 Olive Street, 24<sup>th</sup> Floor St. Louis, MO 63101

Kathy Harrison 200 Madison Street, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

James Fischer Larry Dority Fischer & Dority P.C. 101 Madison Street, Suite 400 Jefferson City, MO 65101

Jeremiah Finnegan Finnegan, Conrad & Peterson L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

Stuart Conrad Finnegan, Conrad & Peterson L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

Leland B. Curtis Curtis, Oetting, et al. 130 S. Bemiston, Suite 200 Clayton, MO 63105

**Charles Brent Stewart** 

KC-1109607-1 3

James B. Deutsch Marc Ellinger Blitz, Bardgett & Deutsch L.C. 308 E. High Street, Suite 301 Jefferson City, MO 65101

Diana M. Vuylsteke Bryan Cave LLP 211 N. Broadway, Suite 3600 St. Louis, MO 63102

Ed Downey Bryan Cave LLP 221 Bolivar Street Jefferson City, MO 65101

/s/ Karl Zobrist
Attorney

KC-1109607-1 4