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March 15, 2002

**VIA UPS** 

FILED

MAR 1 8 2002

Mr. Dale Hardy Roberts
Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Missouri Public Service Commission

De.

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

Dear Mr. Roberts:

Enclosed for filing with the Commission are the original and eight (8) copies of the Response of City of St. Joseph to Order Setting Prehearing Conference and Directing Filing.

Please file-stamp the extra copy of the Response, and return it to me in the enclosed self-addressed stamped envelope. Should you or your staff have any questions concerning this matter, please do not hesitate to call me.

Respectfully your

Karl Zobrist(

KZ/sm Enclosures

cc:

Mr. Keith R. Kreuger

Mr. Stuart W. Conrad

Mr. James B. Duetsch

Mr. John Coffman

Mr. James M. Fischer

Mr. Leland B. Curtis

Mr. W.R. England III

KC-955063-1

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



In the Matter of Missouri-American Water )	Service Commission
Company's Tariff Sheets Designed to Implement)	- Indelon
General Rate Increases for Water and Sewer )	Case No.: WR-2000-281
Service Provided to Customers in the Missouri )	
Service Area of the Company.	

## RESPONSE OF CITY OF ST. JOSEPH TO ORDER SETTING PREHEARING CONFERENCE AND DIRECTING FILING

Intervenor City of St. Joseph states the following in response to the Commission's March 7, 2002 Order Setting Prehearing Conference and Directing Filing:

- 1. The issue litigated by the City of St. Joseph was whether the Commission should adhere to Single Tariff Pricing ("STP"). This was the philosophy followed by the Commission in recent years whereby the costs of Missouri American Water Company's seven unconnected districts were spread across the entire utility system. STP is viewed as the way to avoid rate shock when new plant is placed in rate base and promote rate stability. It creates a system of shared benefits and shared burdens in the infrastructure-intensive water industry. Instead, the Commission decided to move away from STP toward District Specific Pricing ("DSP").
- 2. The Cole County Circuit Court affirmed the DSP decision of the Commission, and the Court of Appeals expressed no opinion on the issue when it remanded all of the appellate proceedings back to the Commission.
- 3. Therefore, the City of St. Joseph has no comment or suggestions with regard to the issues which are before the Commission which do not concern the STP v. DSP controversy. It intends at this time only to monitor these proceedings.



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Attorneys for Intervenor City of St. Joseph

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this \_150 day of March, 2002, to:

Keith R. Krueger Missouri Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102

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Attorney for Intervenor City of St. Joseph

KC-955054-1