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April 6, 2000

**FILED<sup>2</sup>**  
APR 06 2000  
Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Missouri-American Water Company - Consolidated Case Nos. WR-2000-281  
SR-2000-282**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of MAWC's Response to OPC's Second Motion to Compel and Request for Expedited Consideration. Please stamp the enclosed extra copy "filed" and return same to me.

Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: *Dean Cooper hy Rg*  
Dean L. Cooper

DLC/rhg  
Enclosures

cc: Office of the Public Counsel  
Mr. Keith Krueger  
Ms. Shannon Cook  
Mr. Louis Leonatti  
Mr. Jim Fischer  
Mr. Leland Curtis  
Mr. Brent Stewart  
Mr. James Duetsch

Mr. Joseph Moreland  
Mr. Stu Conrad  
Ms. Lisa Robertson  
Ms. Diana M. Vuylsteke  
Mr. Karl Zobrist

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

**FILED<sup>2</sup>**

APR 06 2000

Missouri Public  
Service Commission

In the Matter of Missouri-American	)	
Water Company's Tariff Sheets Designed	)	
to Implement General Rate Increases for	)	Case No. WR-2000-281
Water and Sewer Service provided to	)	Case No. SR-2000-282
Customers in the Missouri Service Area	)	
of the Company.	)	

**MAWC'S RESPONSE TO OPC'S  
SECOND MOTION TO COMPEL  
AND REQUEST FOR EXPEDITED CONSIDERATION**

COMES NOW Missouri-American Water Company ("MAWC" or "Company") and, in response to the Office of the Public Counsel's ("OPC") Second Motion to Compel and Request for Expedited Consideration ("Motion"), states to the Missouri Public Service Commission ("Commission") as follows:

1. On March 31, 2000, the OPC filed its Motion with the Commission. The Motion, among other things, asked that the Commission compel MAWC to respond to OPC's data requests numbers 123, 131, 111 through 118, and 3025.

2. On April 4, 2000, the Commission issued its Order Shortening Time for Response in which it ordered MAWC to file its response, if any, to the OPC Motion no later than 3:00 p.m. on Thursday, April 6, 2000.

3. MAWC's responses to the subject data requests have been hampered by the movement of personnel and changes of responsibilities. However, MAWC has sought to resolve this matter by providing responses to the subject data requests which are agreeable to the OPC. MAWC has provided answers to OPC data requests numbers 131, 111-114, 116-118 and 3025 which it believes have satisfied the OPC requests.

4. MAWC has delivered a partial response to OPC data request number 115 today and

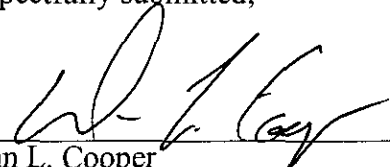
119

will deliver the additional documents to complete this response on Friday, April 7, 2000.

5. The remaining OPC data request is OPC data request number 123. MAWC has delivered a more detailed response to this data request which addresses the information sought as of the most recent date requested – February 29, 2000. Because of the great amount of time involved in compiling the remaining information, MAWC has initiated discussions with the OPC to determine whether an accommodation can be reached as to this remaining information.

WHEREFORE, MAWC respectfully requests that the Commission issue its order: 1) denying the Motion to Compel filed by the OPC on March 31, 2000.

Respectfully submitted,

  
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ATTORNEYS FOR MISSOURI-AMERICAN  
WATER COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 14 day of April, 2000, to the following:

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