FILED<sup>2</sup>
MAR 2 6 2002

## STATE OF MISSOURI MISSOURI PUBLIC SERVICE COMMISSION

Service Commission
--------------------

In the Matter of Missouri-American	)	
Water Company's Tariff Sheets De-	)	
signed to Implement General Rate	)	WR-2000-281
Increases for Water and Sewer Ser-	)	SR-2000-282
vice provided to Customers in the	)	(Consolidated)
Missouri Service Area of the Compa-	)	
ny	)	

ADDITIONAL APPLICATION FOR REHEARING BY
AG PROCESSING INC, A COOPERATIVE,
FRISKIES PETCARE, A DIVISION OF NESTLE USA AND
WIRE ROPE CORPORATION OF AMERICA INC.
GILSTER MARY-LEE CORPORATION AND
CITY OF RIVERSIDE, MISSOURI

COME NOW AG PROCESSING INC, A COOPERATIVE ("AGP"),
FRISKIES PETCARE, A DIVISION OF NESTLE USA ("Friskies") and WIRE
ROPE CORPORATION OF AMERICA INC. ("Wire Rope") (hereinafter
collectively "St. Joseph Industrial Intervenors"), CITY OF RIVERSIDE, MISSOURI ("Riverside"), and GILSTER MARY-LEE CORPORATION
("Gilster"), pursuant to Section 386.500 RSMo. 2000 and apply for
rehearing of the Commission's March 25, 2002 Order Directing
Filing (Order) on the following grounds:

- 1. St. Joseph Industrial Intervenors, Riverside and Gilster incorporate by reference as though fully set out herein all paragraphs of their Application for Rehearing filed herein on March 15, 2002.
- 2. On March 25, 2002 the same Kevin A. Thompson issued a further order herein purporting to correct the March 7, 2002 Order that was the subject of these Applicants' earlier

51476.1

Application for Rehearing by correcting to March 26, 2002 the date for response.

- 3. The March 25, 2002 Order, like the March 7, 2002 is void and of no force or effect in that the said Kevin A. Thompson is disqualified by Section 536.083 RSMo. 2000 from serving in any further respect in this matter.
- 4. Further, the March 25, 2002 Order is also unlawful in that it was issued upon less than a ten-day effective date and was faxed to counsel for these parties at 3:18 p.m. on March 25, 2002, thereby purporting to deny these parties their statutory rights to file an application for rehearing before the purported effective date of such order.
- 5. As with its March 7, 2002 Order, any delegation by the Commission to said Kevin A. Thompson is void as in violation of law as aforesaid.

WHEREFORE the Commission's Order of March 25, 2002 is void as being unlawfully issued and/or unlawfully delegated and

must be set aside, voided or otherwise ruled to be of no force or effect.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

Stuart W. Conrad Mo. Bar #23966 3100 Broadway, Suite 1209 Kansas City, Missouri 64111 (816) 753-1122

Facsimile (816)756-0373 Internet: stucon@fcplaw.com

ATTORNEYS FOR AG PROCESSING INC., FRISKIES PETCARE, A DIVISION OF NESTLE USA and WIRE ROPE CORPORA-TION OF AMERICA, INC.

Jeremiah D. Finnegan Mo.

31,00 Broadway, Suite 1209 Kansas City, Missouri 64111

(816)  $753 - \overline{1122}$ 

Facsimile (816)756-0373

Internet: jfinnegan@fcplaw.com

ATTORNEYS FOR CITY OF RIVERSIDE, MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to the parties of record or their representatives as disclosed by the Commission's records in this proceeding.

Dated: March 26, 2002.

Stuart W. Conrad