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April 6, 2000

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Mr. Dale Hardy Roberts
Secretary/Chief Regulator Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

FILED

APR 10 2000

Re: WR-2000-281 and SR-2000-282

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and (14) copies of *St. Joseph Building and Construction Trade Council's Answers to MAWC's First Set of Data Requests with Certificate of Service*.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

Karen Cockrell
Legal Assistant

kc
Enclosures

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

APR 10 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) and SR-2000-282
Customers in the Missouri Service Area) (Consolidated)
of the Company)

**ST. JOSEPH BUILDING AND CONSTRUCTION
TRADE COUNCIL'S ANSWERS TO MAWC'S
FIRST SET OF DATA REQUESTS**

COMES NOW St. Joseph Building and Construction Trades Council and, pursuant to Rule 4 CSR 240-2.090, states as follows in answer to MAWC's First Set of Data Requests.

1-1 Identify each person whom you expect to call as an expert witness at the trial or hearing of this matter, providing each such person's name, address, occupation, place of employment and qualifications to give an opinion.

ANSWER: None.

1-2 With respect to each person identified in your response to Interrogatory 1-1, state the general nature of the subject matter on which the expert is expected to testify and the expert's hourly deposition fee, if any.

ANSWER: Not applicable.

1-3 Identify any non-retained or non-engaged expert that you expect to call at trial or hearing who may provide expert witness opinion testimony by providing such persons' s name, address and field of expertise.

ANSWER: None.

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1-4 For each expert witness identified above, please provide a list of all proceedings where the expert has testified previously to include the following information:

- a) the court, tribunal or agency which conducted the proceeding;
- b) the case number or equivalent identification of the proceeding;
- c) the caption of the proceeding;
- d) the date of the testimony;
- e) the general nature of the testimony.

ANSWER: Not applicable.

1-5 Please provide with respect to any direct testimony you may file on April 3, 2000 or April 6, 2000, or any rebuttal, surrebuttal or other testimony you may file subsequently, copies of all workpapers which support, or relate to, such testimony.

ANSWER: Not applicable. The St. Joseph Building and Construction Trades Council has not filed, nor does it intend to file, any written testimony.

1-6 In paragraph 3 of your Application for Leave to Intervene, you state that "in order to lower labor costs on its construction projects in the St. Joseph area, [MAWC] has used and continues to use, in substantial part, nonunion contractors to build and maintain its water treatment and distribution systems there." Please quantify and itemize the difference between the labor costs paid by MAWC on the referenced projects and the labor costs which would have been incurred if union labor had been engaged.

ANSWER: The St. Joseph Building and Construction Trades Council does not possess the information sought by this Data Request.

1-7 In Paragraph 4B of your Application for Leave to Intervene, you state that MAWC "is now collecting sufficient revenues to pay the costs of service." Please provide

copies of all documents, calculations, work papers, reports, studies or correspondence which relate to or provide support for this allegation.

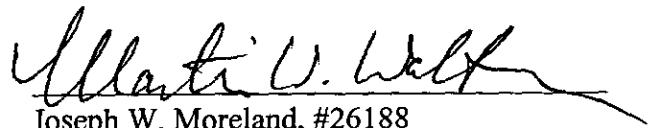
ANSWER: The St. Joseph Building and Construction Trades Council has no responsive documents in its possession.

1-8 In Paragraph 4B of your Application for Leave to Intervene, you state that MAWC "is currently realizing a reasonable return on its capital investments in the State of Missouri." Please provide copies of all documents, calculations, work papers, reports, and studies or correspondence which relate to or provide support for this allegation.

ANSWER: The St. Joseph Building and Construction Trades Council has no responsive documents in its possession.

Respectfully submitted,

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Attorneys for St. Joseph Building &
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CERTIFICATE OF SERVICE

The undersigned, hereby certifies that a copy of the foregoing **St. Joseph Building and Construction Trade Council's Answers to MAWC's First Set of Data Requests** and this **Certificate of Service** were sent by facsimile transmission to Stuart Conrad at (816) 756-0373, and either by United States Mail, postage prepaid, or hand delivery, this 6th day of April, 2000, addressed as follows:

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