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December 8, 1999

FILED

DEC 8 1999

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:

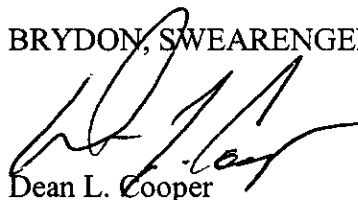
Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of MAWC's Response to Office of the Public Counsel's Request for Local Public Hearings. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



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. Chuck Brown

Mr. Joseph Moreland
Mr. Stu Conrad
Ms. Lisa Robertson

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

DEC 8 1999

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
OFFICE OF THE PUBLIC COUNSEL'S
REQUEST FOR LOCAL PUBLIC HEARINGS**

COMES NOW Missouri-American Water Company ("MAWC" or "Company") and, for its Response to the Office of the Public Counsel's ("OPC") Request for Local Public Hearings, states to the Missouri Public Service Commission ("Commission") as follows:

1. On November 16, 1999, OPC filed its Request for Local Public Hearings wherein it requested that at least one local public hearing be schedule in each of MAWC's seven service areas and that MAWC be required to provide certain notice concerning these hearings.

2. MAWC does not object to the scheduling of local public hearings, as proposed.

3. However, the OPC has requested that notice be provided "to each affected customer, either by imprint on the customer's monthly billing or a bill insert, or a separate mailing not more than 45 days or less than ten days prior to the date of the public hearing."

4. Additionally, Commission Rule 4 CSR 240-2.110(3) states as follows:

Once the commission has set a date for hearing concerning a request for a change in any rate of a public utility, the public utility shall give notice to each affected customer. The public utility shall give notice not more than forty-five (45) days, nor less than ten (10) days, before the first day of the local customer hearing or evidentiary hearing, whichever comes first, unless otherwise ordered by the commission. . . . (emphasis added)

5. The notice requested by the OPC can be accomplished at a limited cost in the six

44

MAWC service areas that bill on a monthly basis (Parkville, Warrensburg, Joplin, Brunswick, Mexico and St. Charles). The exception is the St. Joseph service area, which currently is billed quarterly (approximately every 90 days) on a "cycle billing" schedule. Thus, not all customers in the St. Joseph service area will receive a bill within the thirty-five day window identified in the OPC proposal. Because there are over 30,000 St. Joseph customers, the cost to provide separate notice would be several thousand dollars.

6. Commission Rule 4 CSR 240-2.110(3) permits the exercise of the Commission's discretion as to the notice requirements by stating that certain requirements must be met "unless otherwise ordered by the Commission."

7. MAWC proposes that it be allowed to provide the hearing notice to those customers residing in the St. Joseph service area in its quarterly billing cycle immediately preceding the local public hearing, but no later than ten (10) days prior to said hearing.

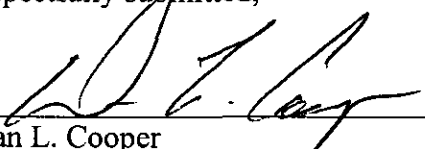
8. Lastly, because MAWC only has approximately one hundred (100) sewer customers statewide, MAWC should be allowed to use separate notifications for water and sewer customers to avoid confusion.

WHEREFORE, MAWC respectfully requests that the Commission issue its order:

- (a) allowing MAWC to notify its customers in the St. Joseph service area in its quarterly billing cycle immediately preceding any local public hearing, but no later than ten (10) days prior to said hearing;
- (b) providing for separate notice for water and sewer customers; and,
- (c) granting such further relief as the Commission deems appropriate in the

circumstances.

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 8th day of December, 1999, to the following:

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