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January 31, 2000

FILED³

JAN 31 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 Staff's Motion to Compel Answers to Data Requests. 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 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

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

FILED³

JAN 31 2000

**Missouri Public
Service Commission**

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

Case No. SR-2000-282

**MAWC'S RESPONSE TO
STAFF'S MOTION TO COMPEL ANSWERS TO DATA REQUESTS**

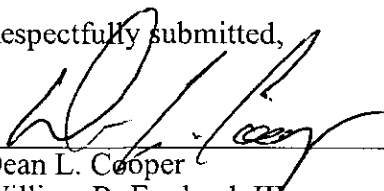
COMES NOW Missouri-American Water Company ("MAWC" or "Company") and, in response to the Commission Staff's ("Staff") Motion to Compel Answers to Data Requests, states to the Missouri Public Service Commission ("Commission") as follows:

1. On January 21, 2000, Staff filed its Motion to Compel Answers to Data Requests. This motion requested that the Commission order MAWC to respond to Staff's data requests 3801 through 3810 within five days after an entry of a Commission order compelling such responses.
2. On January 27, 2000, MAWC hand delivered to Staff responses to Staff data requests 3801 through 3810. MAWC had failed to respond previously due to inadvertent oversight.
3. MAWC believes that it has responded to the data requests that are the subject of Staff's motion and that suggests that Staff's motion is now moot.

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

the Staff's Motion to Compel as moot.

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 31st day of January, 2000, to the following:

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