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February 4, 2002

VIA HAND DELIVERY

FILED³

FEB 04 2002

Mr. Dale Hardy Roberts
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Missouri Public
Service Commission

RE: Missouri American Water Company
Case No.: WO-2002-273

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Response of Intervenor City of Joplin to the Motion to Modify Protective Order, previously filed by MAWC in this case.

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

Sincerely,

James B. Deutsch

James B. Deutsch

JBD:krw
Enclosure

cc: Mr. Keith Krueger, PSC
Ms. Victoria Kizito, PSC
Ms. Ruth O'Neill, OPC
Mr. Stuart Conrad
Mr. Dean Cooper
Mr. Jeremiah Finnegan

(KW5071.WPD;1)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

FEB 04 2002

In the Matter of the Joint Application of)
Missouri-American Water Company,)
St. Louis County Water Company, d/b/a)
Missouri-American Water Company,)
and Jefferson City Water Works, d/b/a)
Missouri-American Water Company, for an)
Accounting Authority Order Relating to)
Security Costs.)

Missouri Public
Service Commission

Case No. WO-2002-273

**RESPONSE OF INTERVENOR CITY OF JOPLIN TO MOTION
TO MODIFY PROTECTIVE ORDER**

COMES NOW Intervenor, City of Joplin, Missouri, and for its Response to the Motion to Modify the Protective Order in this case, filed by Missouri American Water Company (MAWC), states as follows:

1. Intervenor believes that the modifications requested by MAWC to the Protective Order are for the most part unnecessary, and that they are clearly and unreasonably intended to limit access to documentation to be relied upon by MAWC in its request for an Accounting Authority Order.

2. Intervenor has reviewed the Response to the Motion to Modify Protective Order and Request for Evidentiary Hearing filed by the Office of Public Counsel (OPC) and agrees with that Response and with the Suggestions filed by OPC therewith. On behalf of the citizens and ratepayers of the Joplin district served by MAWC, Intervenor strongly believes that any restriction imposed upon Public Service Commission Staff or the Office of Public Counsel should be carefully and specially scrutinized, as PSC Staff and OPC are primary agencies through which ratepayers, like those in the Joplin district, are protected from this public utility's unreasonable rate requests.

WHEREFORE, Intervenor City of Joplin respectfully requests that the Public Service Commission make such modifications as suggested by Staff and OPC to the protective order, and that this Commission otherwise deny the Motion to Modify Protective Order filed by MAWC.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

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Attorney for Intervenor

City of Joplin, Missouri

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the above and foregoing document were sent U.S. Mail, postage prepaid, to the following parties of record on this 4th day of February, 2002:

Victoria L. Kizito
Missouri Public Service Commission
P.O. Box 360
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Attorney for Staff

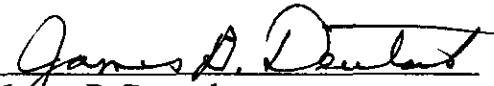
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