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*ALSO ADMITTED IN
KANSAS AND MASSACHUSETTS

December 9, 1999

FILED

DEC 10 1999

FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
301 West High R530
Jefferson City, Missouri 65102

Missouri Public
Service Commission

Re: **Missouri-American Water Company**
Missouri PSC Case Nos. WR-2000-281, SR-2000-282

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) conformed copies of **INDUSTRIAL INTERVENORS' RESPONSE TO RECOMMENDATIONS REGARDING TEST YEAR**, which please file in the above matter and call to the attention of the Commission.

An additional copy of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 

Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

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12/09/99 12:21pm

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

FILED

DEC 10 1999

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

Missouri Public
Service Commission

WR-2000-281
SR-2000-282
(Consolidated)

INDUSTRIAL INTERVENORS' RESPONSE TO RECOMMENDATIONS
REGARDING TEST YEAR

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") (collectively
"Industrial Intervenors") and for their response to the recommen-
dations regarding test year concur in the recommendation of Staff
and Public Counsel that the test year in this docket be estab-
lished as the twelve months ending September 30, 1999 **adjusted**
only for known and measurable changes through December 31, 1999.

On November 29, 1999, and in advance of December 7,
1999, Industrial Intervenors responded to the proposal of Missou-
ri-American Water Co. with respect to test year and true up
therein indicating our opposition to the proposal of Missouri-
American and our own recommendation and position regarding those
periods. We believe those comments adequately address other
issues surrounding the proposed true-up and need not be repeated.
Based on recommendations subsequently received, these Industrial

Intervenors' position at this time is clearly in accord with Public Counsel and Commission Staff^{1/} as regards the appropriate test year and true-up periods.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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

^{1/}Commission Staff's Recommendations "recommends that the test year data be updated for changes that occur through December 31, 1999." We **assume** that Staff's omission of the "known and measurable" standard is an oversight. Public Counsel's recommendation correctly recognizes the known and measurable standard.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application to Intervene by U.S. mail, postage prepaid addressed to the following persons:

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Charles B. Stewart
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Dated: December 9, 1999

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