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Missouri Public Service Commission

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January 21, 2000

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Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED³

JAN 21 2000

Missouri Public
Service Commission

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

RE: Case No. WR-2000-281 (SR-2000-282 Consolidated)

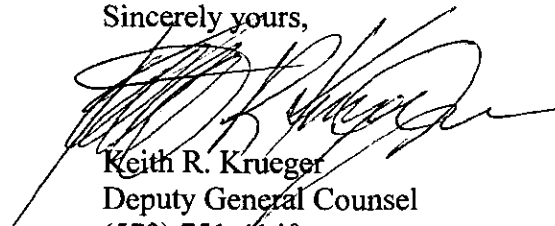
Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF'S MOTION TO COMPEL ANSWERS TO DATA REQUESTS**.

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

Thank you for your attention to this matter.

Sincerely yours,


Keith R. Krueger
Deputy General Counsel
(573) 751-4140
(573) 751-9285 (Fax)

KRK:sw
Enclosure
cc: Counsel of Record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JAN 21 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
SR-2000-282
(Consolidated)

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

COMES NOW the Staff of the Missouri Public Service Commission ("the Staff") and, for its Motion to Compel Answers to Data Requests, states to the Missouri Public Service Commission ("Commission") as follows:

1. On October 15, 1999, Missouri-American Water Company ("MAWC" or "Company") submitted to the Commission proposed tariff sheets intended to implement a general rate increase for the water and sewer service that it provides to its customers in the Missouri service area of the company. The proposed water service tariffs were designed to produce an annual increase of approximately 53.97 percent in the Company's revenues. The proposed sewer service tariffs were designed to produce an annual increase of approximately 5.0 percent in the company's revenues.

2. On November 4, 1999, the Staff submitted a series of data requests ("DRs") to MAWC regarding the Company's rate increase request. These DRs requested that the Company furnish the following information to the Staff:

- a. DR No. 3801 requested that the Company furnish balance sheets and income statements for American Water Works Company, Inc., on a stand-alone basis

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("American"), for American Water Works Company, Inc, and its subsidiaries, on a combined basis ("Combined Companies"); and for the Company.

- b. DR No. 3802 requested that the Company provide detailed information about the short-term debt, long-term debt, and preferred stock of the Company, American, and the Combined Companies.
 - c. DR No. 3803 requested that the Company provide information about the interest rates on all short-term debt of the Company, American, and the Combined Companies, and the average interest rate on short-term debt of the Company for the period ended September 30, 1999.
 - d. DR No. 3804 requested that the Company provide detailed information about the items included on the September 30, 1999 balance sheets of the Company, American, and the Combined Companies as "Losses on Reacquired Debt."
 - e. DR No. 3805 requested that the Company provide additional information so that the answers to DRs 3801, 3802, 3803 and 3804 could be updated to December 31, 1999.
 - f. DR No. 3806 requested that the Company provide copies of the sections of the mortgage indentures of the Company and of American that describe each company's net earnings and/or interest coverage requirements.
 - g. DR No. 3807 requested that the Company provide information about the return on equity expectations of the Company, American and the Combined Companies for the fiscal years of 1999, 2000, and 2001.
 - h. DR No. 3808 requested that the Company provide copies of correspondence between the Company or American and outside financial analysts concerning the Company's or American's credit rating, capital structure and/or cost of capital.
 - i. DR No. 3809 requested that the Company provide a copy of American's SEC Form 10-K for the fiscal year ended December 31, 1999.
 - j. DR No. 3810 asked the Company to describe the nature of any changes in its capital structure that will occur between December 31, 1999 and September 8, 2000.
3. Copies of Staff's Data Requests Nos. 3801-3810 are attached hereto as Exhibit A.
4. All of the information that the Staff requested in its Data Requests Nos. 3801-3810 is relevant and material to the issues that are presented in this case.
5. Rule 4 CSR 240-2.090 (2) requires parties, to whom data requests are directed, to file responses to the DRs within 20 days after receipt unless otherwise agreed by the parties to the

DRs. The rule further provides that if a party objects to the data requests or is unable to answer within 20 days, the recipient will serve all of its objections or reasons for its inability to answer in writing upon the requesting party within 10 days after it receives the DRs.

6. The rule therefore required that the Company either answer DRs 3801-3810 by November 24, 1999, or object to them or tell why it would not be able to timely respond to them, by no later than November 14, 1999.

7. The parties did not agree that the answers to DRs 3801-3810 could be delayed beyond the due date specified in 4 CSR 240-2.090 (2).

8. The Company has neither responded to any of the said DRs 3801-3810, nor objected to them, nor informed the Staff why it is unable to answer the DRs by the deadline and when it will be able to provide the answers.

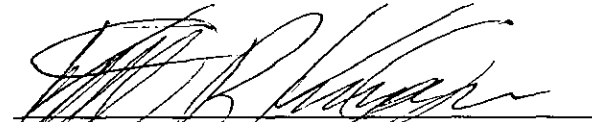
9. On December 27, 1999, the Commission issued its Order Adopting Procedural Schedule, in which, among other things, it ordered the Staff to file direct testimony on all issues except rate design by 3:00 p.m. on March 20, 2000.

10. Unless the Staff promptly receives the information that it requested in DRs 3801-3810, the Staff will not be able to adequately prepare the testimony that it must file by March 20, 2000.

WHEREFORE, the Staff moves the Commission for an order compelling the Company to answer Staff Data Requests Nos. 3801-3810 within five days after the entry of the Commission's order to compel answers.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (Telephone)
(573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 21st day of January, 2000.



DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3801

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Please provide the a Balance Sheet and Income Statement as of September 30, 1999 for each of
the following Companies: 1.
American Water Works Company, Inc. (Stand Alone Basis);
2. American Water Works Company, Inc. and its subsidiaries (Combined Basis); and
3. Missouri-American Water Company

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in Missouri-American Water Company's Marlton, New Jersey office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Missouri-American Water Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3802

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Please provide, in detail, including any supporting calculations, the following items for each issue as of September 30, 1999 for American Water Works Company, Inc. (Stand Alone Basis), American Water Works Company, Inc. and its subsidiaries (Combined Basis), and Missouri-American Water Company's short-term debt, long-term debt and preferred stock:

1. Issuance date and maturity date;
2. Principal amount originally issued and amount outstanding;
3. Interest rate and interest payment dates;
4. Issuance expenses (amortized and unamortized balances);
5. Premium or discount amounts (amortized and unamortized balances); and
6. Dates and amounts of sinking funds.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in Missouri-American Water Company's Marlton, New Jersey office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Missouri-American Water Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed by: _____

Date Response Received: _____

Prepared by:

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3803

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: In reference to American Water Works Company, Inc. (Stand Alone Basis), American Water Works Company, Inc. and its subsidiaries (Consolidated Basis), and Missouri-American Water Company's short-term debt, please provide an explanation on how the interest rates are determined for each loan. As an example, are the interest rates based upon equations such as one percentage point below prime, a commercial paper rate or negotiated between the parties at no predetermined rate? Please provide the average short-term debt interest rate paid by Missouri American Water Company for the 12-month period ended September 30, 1999.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in Missouri-American Water Company's Marlton, New Jersey office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Missouri-American Water Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3804

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Please provide, in detail, including any supporting calculations, the following items related to past debt issuances of American Water Works Company, Inc. (Stand Alone Basis), American Water Works Company, Inc. and its subsidiaries (Consolidated Basis), and Missouri-American Water Company in which unamortized balances are reported as "Losses on Reacquired Debt" on the Balance Sheet for September 30, 1999:

1. Issuance date, date called and maturity date; 2.

Original issuance expenses and debt discount or premium; 3.

Unamortized balances at date called for the above mentioned items; 4.

Calculations supporting current monthly amortization.

In addition, if the debt item associated with the "Losses on Reacquired Debt" was refinanced with proceeds from another debt issuance, please indicate which debt issuance was used in the refinancing.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

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Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3805

Requested From: Mr. Jim Salser
Date Requested: November 4, 1999
Information Requested: In regard to the financial information previously requested in Staff's Data Information Request Nos. 3801, 3802, 3803, and 3804, please provide updated copies when available of the same financial information as of December 31, 1999.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided:

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by:

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3806

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Please provide a copy of the section or sections of American Water Works Company, Inc. and Missouri-American Water Company's Indenture of Mortgage that describes its net earnings and/or interest coverage requirements.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by:

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3807

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Please provide targeted or projected return on equity expectations for American Water Works Company, Inc. (Parent Only) and American Water Works Company, Inc. and its subsidiaries, and Missouri-American Water Company for the fiscal years of 1999, 2000 and 2001.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

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Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3808

Requested From: Mr. Jim Salser
Date Requested: November 4, 1999
Information Requested: Please provide copies of all correspondence provided within the last two years to or from any outside financial analysts concerning American Water Works Company, Inc. and Missouri-American Water Company's credit rating, capital structure and/or cost of capital.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3809

Requested From: Mr. Jim Salser
Date Requested: November 4, 1999
Information Requested: Please provide a copy of American Water Works Company Inc.'s SEC Form 10-K for the fiscal year ended December 31, 1999.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
MISSOURI-AMERICAN WATER COMPANY
CASE NUMBER WR-2000-281/SR-2000-282

No. 3810

Requested From: Mr. Jim Salser

Date Requested: November 4, 1999

Information Requested: Is Missouri-American Water Company aware of any changes in its capital structure (i.e., issue or repurchases/repayments of debt or equity) between December 31, 1999 and the operation of law date (estimated to be September 8, 2000) in this case? If yes, please explain the nature of the transaction(s) in detail, including pro forma estimates of the amount of the items 1 through 6 requested in Staff Data Information Request No 3802.

Requested By: Roberta McKiddy, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. WR-2000-281/SR-2000-282 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by: _____

**Service List for
Case No. WR-2000-281
January 21, 2000**

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Jefferson City, MO 65102

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