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January 14, 2002

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WESS A. HENDERSON
Director, Utility Operations
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Director, Utility Services
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Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

FILED²

JAN 14 2002

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. WE-2002-240-In re the Annual Report of Osage Water Company for the Calendar Year Ending December 31, 1999.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S REQUEST FOR ENLARGEMENT OF TIME IN WHICH TO FILE RESPONSE AND MOTION FOR EXPEDITED TREATMENT.**

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,

Victoria L. Kizito
(573) 751-6726 (Telephone)
(573) 751-9285 (Fax)

Enclosure
cc: Counsel of Record

JAN 14 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In re the Annual Report of Osage Water)
Company for the Calendar Year Ending)
December 31, 1999.)

Case No. WE-2002-240

STAFF'S REQUEST FOR ENLARGMENT OF TIME IN WHICH
TO FILE RESPONSE AND
MOTION FOR EXPEDITED TREATMENT

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and respectfully requests an enlargement of time in which the Staff has to file its response to Osage Water Company's Motion for Leave to File Delinquent Annual Report. Staff also requests an expedited ruling upon Staff's request for the enlargement of time. In support of these requests, Staff states:

1. On or about November 28, 2001, Osage Water Company (Company) filed its Motion for Leave to File Delinquent Annual Report.
2. The Commission granted Staff's first request to enlarge the time in which Staff had to file its response until Tuesday, January 15, 2002. The Staff's first request for an enlargement of time was requested for Staff to have adequate time to analyze the Company's 1999 Annual Report.
3. Pursuant to 4 CSR 240-2.050(3)(A), Staff requests that the Commission again enlarge the time in which Staff has to file its Response, until February 5, 2001. The enlargement of time will allow Staff to work with the Company to correct or explain discrepancies Staff has found in the Company's 1999 Annual Report in relation to prior annual reports and audits conducted by Staff. Staff believes it would be more productive

to work with the Company toward this end before filing its Response to the Company's Motion for Leave to File Delinquent Annual Report.

4. Greg Williams, Attorney for Osage Water Company, has no objection to Staff's request for enlargement of time until February 5, 2002.

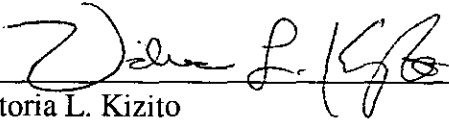
5. This request for enlargement of time is not made for the purposes of harassment or delay.

6. Pursuant to 4 CSR 240-2.080(17), the Staff requests the Commission's expedited ruling by January 15, 2002, on Staff's Motion for Enlargement of Time. The Staff requests an expedited treatment so Staff's motion for extension of time will be ruled on by the due date of Staff's Response. No harm will be caused by an expedited ruling on Staff's motion. Finally, Staff's motion for enlargement of time was filed as soon as possible, in that Staff has been occupied with deadlines in other cases.

WHEREFORE, Staff respectfully requests that the Commission grant Staff's request for an enlargement of time within which to file its response to the Company's Motion for Leave to File Delinquent Annual Report, and order that Staff's response is due **February 5, 2002**. Staff further requests that the Commission rule on said motion on an expedited basis by **January 15, 2002**.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Victoria L. Kizito
Associate General Counsel
Missouri Bar No. 46244

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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 14th day of January, 2002.



Service List for

WE-2002-240

Revised: January 14, 2002, (cgo)

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