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August 18, 2000

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Secretary/Chief Regulatory Law Judge

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

**RE: Case No. SR-2000-556**

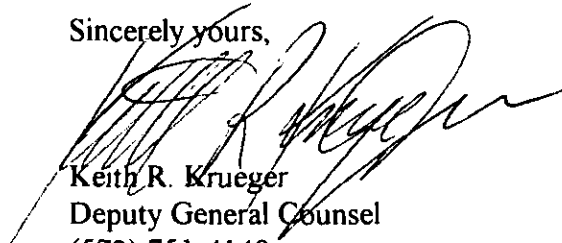
Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO COMPANY'S MOTION TO COMPEL COMPLETION OF STAFF INVESTIGATION AND REPORT.**

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/dkf  
Enclosure  
cc: Counsel of Record

FILED

AUG 18 2000

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 18 2000

Missouri Public  
Service Commission

In the Matter of Osage Water Company's )  
Request for a Rate Increase for Sewer )  
Service Pursuant to the Public Service )  
Commission's Small Company Rate )  
Increase Procedure.

Case No. SR-2000-556, et al.

**STAFF'S REQUEST FOR EXTENSION OF TIME**  
**TO RESPOND TO COMPANY'S**  
**MOTION TO COMPEL COMPLETION OF STAFF INVESTIGATION AND REPORT**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and, for its Request for Extension of Time to Respond to Motion to Compel Completion of Staff Investigation and Report, states to the Missouri Public Service Commission ("Commission") as follows:

1. On August 8, 2000, Osage Water Company ("Company") filed a Motion to Compel Completion of Staff Investigation and Report in this case.

2. Rule 4 CSR 240-2.080 (16) provides that: "Parties shall be allowed not more than ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission." According to the said rule, the Staff's response to the Company's Motion, if any, must be filed by no later than Friday, August 18, 2000.

3. The Staff believes it has meritorious defenses to the Company's said Motion. However, due to the press of other business, including preparation for the move of the Commission's offices from the Harry S. Truman Building to the Governor Office Building and other matters, the Staff has not been able to prepare a timely response to the Company's Motion. Furthermore, the Staff's attorney on this case did not receive a copy of the Company's said

Motion until Thursday, August 17, 2000, one day before the deadline established by rule for filing a response.

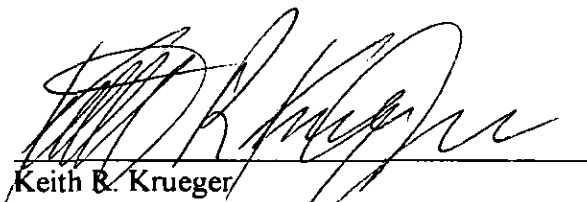
4. The Staff therefore requests an extension of time, to Wednesday, August 23, 2000, to file its response to the Company's Motion.

5. Rule 4 CSR 240-2.015 (1) provides that: "A rule in this chapter may be waived by the commission for good cause." The Staff submits that the circumstances of this case constitute good cause, and that the requested extension of time may be granted pursuant to Rule 4 CSR 240-2.015 (1) and Rule 4 CSR 240-2.080 (16).

**WHEREFORE**, the Staff respectfully requests that the Commission extend the time for Staff to file its Response to Motion to Compel Completion of Staff Investigation and Report to Wednesday, August 23, 2000.

Respectfully submitted,

DANA K. JOYCE  
General Counsel



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

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Service List for  
Case No. SR-2000-556  
August 18, 2000

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