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October 29, 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Truman State Office Building, 5th floor
Jefferson City, MO 65102

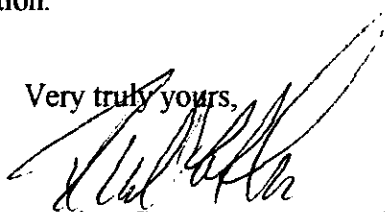
Re: Case No. AX-2000-116

Dear Secretary Roberts:

Enclosed for filing please find an original and fourteen copies of the comments of St. Louis County Water Company regarding the Commission's proposed rulemaking in the above case. Will you please see to it that this matter is properly filed and brought to the attention of the Commission.

Thank you for your assistance and cooperation.

Very truly yours,

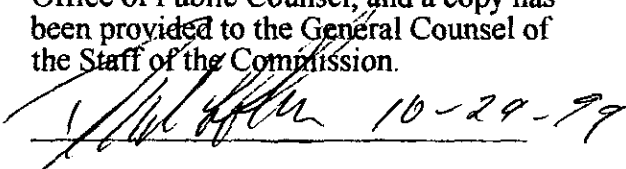


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Attorneys for St. Louis County
Water Company

By: Richard T. Ciottone, Of Counsel
MBE#21530

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Two copies of the foregoing have on this date been sent by prepaid U.S. Mail to the Office of Public Counsel, and a copy has been provided to the General Counsel of the Staff of the Commission.


10-29-99

FILED³

OCT 29 1999

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED

OCT 29 1999

Missouri Public
Service Commission

In the matter of the comments of)
St. Louis County Water Company) Case No. AX-2000-116
regarding proposed rule changes in)
4 CSR 240-2.080.)

COMMENTS REGARDING PROPOSED RULEMAKING

Comes now St. Louis County Water Company, ("Water Company") and for its comments regarding the proposed changes to the Commission's Rules of Practice and Procedure in 4 CSR 240-2.080, states as follows:

1. Water Company is a corporation organized and existing under the laws of the State of Missouri, and a Water Corporation subject to the jurisdiction of the Missouri Public Service Commission ("Commission").

2. Water Company objects to certain proposed rules in 4 CSR 240-2.080, to wit (all references hereafter are to 4 CSR 240-2.080 unless otherwise specified):

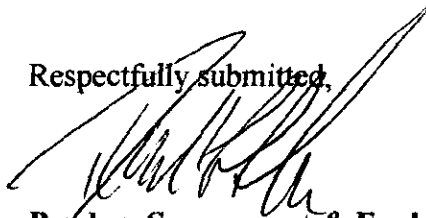
Subsection (17)(C) requires in a Motion for Expedited Treatment that there be filed with the request, "An attestation by the moving party that the pleading was filed as soon as it could have been or an explanation why it was not." This information is not relevant to the issue of whether or not expedited treatment should be appropriate. It is instead aimed at the issue of blame. The requirement suggests that in situations where expedited treatment would avoid substantial harm and cause substantial benefit to accrue (the legitimate requirements of [17][B]) it might otherwise be withheld if the Commission found employee fault. This requirement is neither constructive nor appropriate when attempting to determine the public interest.

3. Generally, the proposed changes proffered by the Commission, including those in the various sections and subsections of 4 CSR 240-2.080, are difficult to evaluate. This is because the Commission has chosen to advance its propositions without

describing those sections that are intended to remain unchanged. The interrelationship between proposed changes and matters unchanged is therefore difficult to ascertain. Other agencies use a system of deletions and additions with such devices as italics or black lining. The Commission is encouraged to emulate the methods of other agencies, as the cost and efficiency of the presentation would be more than outweighed by the cost and efficiency of the analyses by affected parties.

WHEREFORE, Water Company prays that modifications be made to the Commission's proposed rules in accordance with the Comments herewith presented.

Respectfully submitted,

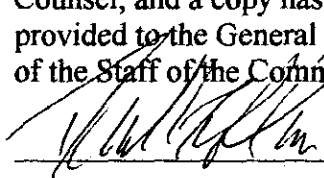


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CERTIFICATE OF SERVICE

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 10-29-99