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December 15, 2004

Hon. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65201

**FILED<sup>3</sup>**

**DEC 17 2004**

Missouri Public  
Service Commission

ATTN: Filing Desk

Re: In Re the Joint Application of Missouri American Water Company, Osage Water Company, and Environmental Utilities, LLC  
WO-2005-0086

Dear Judge Roberts:

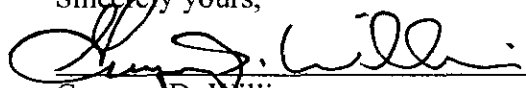
Please find enclosed for filing in the above referenced matter the original and 8 copies of the following:

1. Applicant Environmental Utilities, LLC's Request for Admissions from The Staff of the Missouri Public Service Commission.
2. Applicant Environmental Utilities, LLC's Request for Admissions from the Office of Public Counsel.
3. Applicant Environmental Utilities, LLC's Request for Admissions from Missouri Department of Natural Resources and Clean Water Commission.
4. Applicant Environmental Utilities, LLC's Request for Admissions from Cedar Glen Condominium Owners Association, Inc.
5. Applicant Environmental Utilities, LLC's Request for Admissions from Hancock Construction Company.

An additional copy of each pleading is also enclosed to be stamped "filed" and returned to me in the enclosed envelop.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely yours,

  
Gregory D. Williams

cc: Osage Water Company  
Counsel of Record

**FILED<sup>3</sup>**

**DEC 17 2004**

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

**Missouri Public  
Service Commission**

In the Matter of the Joint Application of )  
**Missouri-American Water Company** and both )  
**Osage Water Company and Environmental** )  
**Utilities, L.L.C.** for Authority for Missouri- )  
American Water Company to acquire the water )  
and sewer utility assets of both entities, and for )  
the transfer to Missouri-American Water Company )  
of Certificates of Convenience and Necessity )  
to continue operation of such assets as Water and )  
Sewer Corporations regulated by the Missouri )  
Public Service Commission. )

Case No. WO-2005-0086

**APPLICANT ENVIRONMENTAL UTILITIES, LLC'S  
REQUEST FOR ADMISSIONS FROM  
THE STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION**

COMES NOW Environmental Utilities, LLC and Requests that the Staff of the  
Missouri Public Service Commission admit the following:

1. That the proposed sale of the assets of Environmental Utilities, LLC to Missouri  
American Water Company as set forth in the Application and the Exhibits  
attached thereto is not detrimental to the interests of the members of the public  
who receive service from said assets.

Response:

2. That the proposed sale of the assets of Osage Water Company to Missouri  
American Water Company as set forth in the Application and the Exhibits  
attached thereto is not detrimental to the interests of the members of the public  
who receive service from said assets.

Response:

3. That the proposed purchase by Missouri American Water Company of the water and sewer systems owned by Hurricane Deck Holding Company as set forth in the Application and the Exhibits attached thereto is not detrimental to the interests of the members of the public who receive service from said assets.

Response:

4. That the proposed purchase by Missouri American Water Company of the sewer systems owned by Gregory D. Williams and Debra J. Williams as set forth in the Application and the Exhibits attached thereto is not detrimental to the interests of the members of the public who receive service from said assets.

Response:

5. That the proposed sale of assets as set forth in the Application and the Exhibits attached thereto is not detrimental to the public.

Response:

6. That the Missouri Public Service Commission does not have the legal authority to determine the interests of persons making claim to the proceeds of the sale of the assets of Osage Water Company. *See State ex rel. FEE FEE TRUNK SEWER, INC. vs. Litz*, 596 S.W.2d 466 (Mo. App. E.D. 1980).

Response:

7. That the allowable rate base value of the assets to be purchased by Missouri American Water Company as set forth in the Application and the Exhibits attached thereto is not less than the aggregate of the proposed sale prices for said Assets.

Response:



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#### CERTIFICATE OF SERVICE

I hereby certify that on the 16 day of June, 2004 a true copy of the foregoing was served on all parties of record by depositing the same in first class mail, postage prepaid, and addressed as follows:

Dana K. Joyce, P.O. Box 360, Jefferson City, MO 65102; Office of Public Counsel, P.O. Box 7800, Jefferson City, MO 65102; Mark Comley, P.O. Box 537, Jefferson City, MO 65102; Timothy Duggan, P.O. Box 899, Jefferson City, MO 65102; Terry Allen, P.O. Box 1702, Jefferson City, MO 65102; Dean Cooper, 312 East Capitol Ave., Jefferson City, MO 65102.



Gregory D. Williams