

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

Office of the Public Counsel,
an agency of the State of Missouri,
COMPLAINANT

v.

Central Jefferson County Utilities, Inc.,
RESPONDENT

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)
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) **Case No. WC-2007-0038**
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PUBLIC COUNSEL'S REQUEST FOR LOCAL PUBLIC HEARING

COMES NOW the Office of the Public Counsel and for its Request for Local Public Hearing states as follows:

1. On July 27, 2006, Public Counsel filed two separate water and sewer overearnings complaints against Central Jefferson County Utilities, Inc. (Central Jefferson) with the Missouri Public Service Commission (Commission). The Commission consolidated these complaints into the present case.

2. On August 15, 2006, Central Jefferson filed two separate applications with the Commission, seeking the Commission's authorization to transfer and assign certain assets of its water and sewer operations to the Jefferson County Public Sewer District (Sewer District). The Commission consolidated these applications into Case No. SO-2007-0071.

3. Both the present case (Overearnings Case) and Case No. SO-2007-0071 (Sale Case) are interrelated in that Public Counsel has a concern that the current excessive rates will be carried over to the new Sewer District owner over which the Public Service Commission has no regulatory oversight.

4. Public Counsel requests a local public hearing for the Overearnings Case be held concurrently with a local public hearing for the Sale Case. Both cases, for the most part, affect the same customers. The ratepayers should have an opportunity to be heard regarding the transfer and assignment of the water and sewer operations to the Sewer District. These comments may be used to determine if there is any detriment or disadvantage to customers. The ratepayers also should have an opportunity to comment on the current rates, especially if the proposed transfer results in the adoption of these rates or even higher rates. It may be that ratepayers (and property owners that have been unable to connect to the Central Jefferson system) are more interested in quickly consummating the sale than they are in addressing the excessive rates. A local public hearing will allow Public Counsel and the Commission to assess the public sentiment and determine the public interest.

5. Public Counsel requests that the local public hearing be held expeditiously, consistent with adequate notice to customers and the Commission's schedule.

WHEREFORE, Public Counsel respectfully requests that the Commission schedule a local public hearing.

Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ Christina L. Baker

By:_____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 20th day of September 2006:

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