

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

In the Matter of Public Counsel's Petition To)	
Open a Workshop Docket to Investigate)	File No. WO-2009-0362
Solutions to Issues Faced by Small Water and)	SO-2009-0363
Sewer Regulated Public Utilities.)	

OFFICE OF THE PUBLIC COUNSEL'S REPLY TO STAFF'S RESPONSE

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Reply to Staff's Response states as follows:

1. On April 13, 2009, the Staff of the Missouri Public Service Commission (Staff) filed its response to Public Counsel's petition to open a workshop docket to investigate solutions to issues faced by small water and sewer regulated public utilities. In its response, Staff conceded the need for a workshop, but, due to Staff's current workload, requested the Missouri Public Service Commission (Commission) begin the workshop as of August 20, 2009.
2. Public Counsel fully understands Staff's statements regarding its current workload at this time. Public Counsel has similar workload demands to Staff with much fewer employees. But, there is nothing to indicate that workloads will not continue to be busy for everyone involved.
3. Public Counsel considers a workshop docket to investigate solutions to the issues faced by small water and sewer regulated public utilities to be a top priority. Even though Public Counsel's workload is just as busy as Staff's, Public Counsel believes the Commission should convene the workshop as soon as possible.
4. In order to alleviate Staff's concerns and relieve some of its burden, Public Counsel states that it will volunteer to be the primary entity responsible for the workshop. As Staff stated, many administrative tasks are necessary to ensure the success of a workshop docket before the

Commission. Public Counsel will be more than happy to attend to these tasks, such as making contacts, encouraging participation and initiating the workshop, etc.

5. To this end, Public Counsel states that it has already been in contact with Mr. Jack McManus and Ms. Kara Valentine, attorneys with the Attorney General's Office, and Mr. Marty Miller, attorney with the Department of Natural Resources. Mr. McManus, Ms. Valentine and Mr. Miller have voiced their respective agency's support for the workshop docket. Ms. Valentine and Mr. Miller have graciously agreed to assist Public Counsel as needed in the tasks of making contacts and encouraging participation within their agencies.

6. The problems faced by small water and sewer regulated public utilities and their customers require immediate attention. Public Counsel suggests that the sooner a workshop docket is held to bring together the various stakeholders, the sooner creative solutions can be found.

7. Therefore, Public Counsel suggests that the Commission should open a workshop docket as soon as possible, rather than waiting until August 20, 2009 as requested by Staff in its Response.

WHEREFORE, Public Counsel submits its Reply.

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 April 2009:

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