

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

In the Matter of the Coordinated Effort)	
Concerning Missouri-American Water)	
Company's Facilities Located In Its)	Case No. WO-2004-0609
Jefferson City District.)	

**STAFF'S SECOND MOTION FOR EXTENSION OF TIME
TO FILE STUDY REPORT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and, for its Second Motion for Extension of Time to File Study Report, states to the Missouri Public Service Commission as follows:

1. On April 6, 2004, the Commission issued an order in Case No. WR-2003-0500, directing the parties to that case to comply with the terms of the Fire Suppression Stipulation and Agreement that was filed in that case on March 4, 2004. That Stipulation and Agreement provided that the parties would study certain facilities in Missouri-American's Jefferson City District. It further provided that the parties would jointly or separately prepare a report describing the results of the study no later than 12 months after the effective date of the "Report and Order" in Case No. WR-2003-0500. The Staff understands that the original deadline for filing the study report was April 21, 2005.

2. On April 21, 2005, the Staff filed a Motion for Extension of Time to File Study Report, in which it requested that the deadline for filing the subject report be extended by 60 days, to June 20, 2005. The Staff's motion is still pending before the Commission.

3. Missouri-American, the Staff, and the City of Jefferson have met on several occasions to carry out this coordinated effort, have reached verbal agreement on the substance of the study

report, and have completed and circulated a draft of the study report. The Staff believes the said draft memorializes the agreements and intentions of the parties. However, the document has not yet been fully executed, because the City of Jefferson has not yet had sufficient time to fully review the proposed Joint Report.

4. Rule 4 CSR 240-2.050 (3) (A) provides that when an act is required to be done by order of the Commission at or within a specified time, the Commission, at its discretion, may order the period enlarged before the expiration of the period originally prescribed or as extended by a previous order.

5. The parties believe that they will be able to complete and file the report within the next 10 days. The Staff therefore requests a 10-day extension of the time by which the parties must file the study report. No one will be harmed by this short delay in filing the study report, and Missouri-American has informed the Staff that it supports this 10-day extension.

WHEREFORE, the Staff moves the Commission for a 10-day extension of the deadline for filing the study report in this case, so that the study report would be due no later than June 30, 2005.

Respectfully submitted,

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/s/ Keith R. Krueger

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record as shown on the attached service list this 20th day of June 2005.

/s/ Keith R. Krueger