

**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 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 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, entitled "Order Approving Stipulations and Agreements." In Ordered Paragraph 2 of that order, the Commission ordered the parties to that case to comply with the terms of the Fire Suppression Stipulation and Agreement that was filed in Case No. WR-2003-0500 on March 4, 2004.

2. The Stipulation and Agreement as to Jefferson City Fire Suppression Issues, which the Commission mentioned in its order in Case No. WR-2003-0500, was executed on March 4, 2004, by Missouri-American Water Company, the Staff, and the City of Jefferson City, Missouri, and filed with the Commission on the same date. It provided that within 30 days of the effective date of a Report and Order in Case No. WR-2003-0500, the parties would convene in a coordinated effort to study certain Missouri-American's facilities in its Jefferson City District. It further provided that, following the study, the parties would jointly or separately prepare a report describing the results of the study, including any recommendations regarding the maintenance, improvement, or replacement of the facilities studied. The parties agreed that the report would

be submitted to the Commission no later than 12 months after the effective date of the “Report and Order” in Case No. WR-2003-0500.

3. The Commission did not issue a “Report and Order” in Case No. WR-2003-0500. The document that is most nearly equivalent to a Report and Order is entitled “Second Order Approving Tariff in Compliance with Commission Order, Granting Motion for Expedited Treatment and Closing Case.” It was issued on April 20, 2004, and bore an effective date of April 21, 2004. Accordingly, the Staff believes that the deadline for filing the study report is April 21, 2005.

4. On June 22, 2004, Missouri-American and the City of Jefferson City filed a Joint Application to open a case for the purpose of receiving the study report. The Commission issued its order establishing this case for that purpose on July 6, 2004.

5. Missouri-American, the Staff, and the City of Jefferson City have met on several occasions to carry out this coordinated effort, and have reached verbal agreement on the substance of the study report, which will address the capacity of Missouri-American’s water plant, the necessity or desirability of replacing some small mains, and several other issues. Gilbert Cole, the manager of Missouri-American’s Jefferson City District has nearly completed a draft of the study report, for circulation to the other parties.

6. The study report is not yet ready to be filed, but the parties believe that they will be able to complete and file the report within the next 60 days. The Staff therefore requests a 60-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 and the City of Jefferson City have informed the Staff that they support this 60-day extension.

WHEREFORE, the Staff moves the Commission for a 60-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 20, 2005.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Keith R. Krueger

Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (Telephone)
(573) 751-9285 (Fax)
keith.krueger@psc.mo.gov

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 21st day of April 2005.

/s/ Keith R. Krueger