## Blitz, Bardgett & Deutsch, L.C.

Attorneys at Law

Robert D. Blitz John E. Bardgett, Sr. James B. Deutsch Richard B. Rothman Robert C. O'Neal R. Thomas Avery Henry T. Herschel Andrea L. Charters Marc H. Ellinger Peter C. Palumbo III 308 East High Street, Suite 301
Jefferson City, Missouri 65101-3237
Telephone (573) 634-2500
Facsimile (573) 634-3358
E-Mail atty@blitzbardgett.com

120 South Central - Suite 750
St. Louis, Missouri 63105-1794
Telephone (314) 863-1500
Facsimile (314) 863-1877

April 7, 2000

#### **VIA HAND DELIVERY**

FILED<sup>3</sup>
APR 0 7 2000

Missouri Public Service Commission

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

RE:

Missouri American Water Company

Case No.: WR-2000-281, et al.

Dear Mr. Roberts:

Enclosed herewith for filing please find an original and fourteen copies of Intervenor City of Joplin's Suggestions in Support of Office of Public Counsel's Motion for Order Scheduling Local Public Hearings and Request for Expedited Consideration regarding the above-referenced cause of action. An additional copy has been enclosed to be stamped "filed".

Thank you for your time and attention to this matter.

Sincerely,

James B. Deutsch

James B. Deutal

JBD:krw

**Enclosures** 

(KW2214,WPD;1)

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



Missouri Public Service Commission

In the Matter of Missouri-American	)		OULT
Water Company's Tariff Sheets Designed	)		
to Implement General Rate Increases for	)	Case No. WR-2000-281, et al.	
Water and Sewer Service Provided to	)		
Customers in the Missouri Service Area	)		
of the Company.	)		

# INTERVENOR CITY OF JOPLIN'S SUGGESTIONS IN SUPPORT OF OFFICE OF PUBLIC COUNSEL'S MOTION FOR ORDER SCHEDULING LOCAL PUBLIC HEARINGS AND REQUEST FOR EXPEDITED CONSIDERATION

COMES NOW the City of Joplin, Missouri, an Intervenor in this case, and states that it fully supports and joins in the Motion filed by the Office of Public Counsel on or about April 4, 2000, requesting an Order of this Commission scheduling local public hearings.

Intervenor City of Joplin intends to participate in such local public hearings, including those local public hearings scheduled for Joplin, Missouri, and believes that the schedule, notification requirements and necessity for expedited consideration as set forth in the Office of Public Counsel's Motion are reasonable, appropriate and necessary to effectuating such local public hearings.

WHEREFORE, the City of Joplin respectfully requests that the Commission issue its Order scheduling local public hearings and providing adequate notice to the public as set forth in the April 4, 2000 Motion of the Office of Public Counsel, that the Commission give such Motion expedited consideration, and for such other and further orders as the Commission deems appropriate in the circumstances.



Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

James B. Deutsch, #27093 308 East High Street

Suite 301

Jefferson City, MO 65101

Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358

Attorneys for Intervenor City of Joplin

### **CERTIFICATE OF SERVICE**

I hereby certify true and correct copies of the above and foregoing document were sent U.S. Mail, postage prepaid, to the following parties of record on this 7th day of April, 2000:

General Counsel
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Chuck D. Brown
City Attorney
P.O. Box 1366
Joplin, MO 64802-1355

James Fischer Attorney At Law 101 West McCarty, Suite 215 Jefferson City, MO 65101

Joseph W. Moreland/Martin Walter Blake & Uhlig, P.A. 2500 Holmes Road Kansas City, MO 64108

Louis J. Leonatti Leonatti & Baker P.O. Box 758 Mexico, MO 65265

Lisa Robertson City of St. Joseph City Hall - Room 307 1100 Frederick Avenue St. Joseph, MO 64501

Shannon Cook/John B. Coffman Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102-7800 Dean L. Cooper/W.R. England, III Brydon, Swearengen & England P.O. Box 456 Jefferson City, MO 65102-0456

Stuart Conrad Finnegan, Conrad & Peterson, L.C. 3100 Broadway, Suite 1209 Kansas City, MO 64111

Leland B. Curtis Curtis, Oetting, Heinz, Garrett & Soule, P.C. 130 South Bemiston, Suite 200 St. Louis, MO 63105

Charles Brent Stewart Stewart & Keevil, L.L.C. 1001 Cherry Street, Suite 302 Columbia, MO 65201

Diana Vuylsteke One Metropolitan Square 211 North Broadway St. Louis, MO 63102-2750

Karl Zobrist Blackwell Sanders Peper Martin, LLP 2300 Main Street, Suite 1100 Kansas City, MO 64108

ames B. Deutsch

(KW2213.WPD;1)