

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

The Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	
v.)	Case No. WC-2008-0030
)	
Suburban Water and Sewer Co. and)	
Gordon Burnam,)	
)	
Respondents.)	

**OFFICE OF THE PUBLIC COUNSEL’S SUGGESTIONS IN SUPPORT OF
STAFF’S MOTION FOR EVIDENTIARY HEARING**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Suggestions in Support of Staff’s Motion for Evidentiary Hearing states as follows:

1. On January 4, 2008, the Staff of the Missouri Public Service Commission (Staff) filed its Updated Report and Motion for Evidentiary Hearing. In its filing, Staff addressed the current condition of the Suburban Water and Sewer Co. (Suburban) standpipe and stated that the condition of the standpipe compelled Staff to renew its November 13, 2007 request for hearing and move the Missouri Public Service Commission (Commission) again to address the safety and adequacy of Suburban’s provision of water services to its customers.

2. Staff’s filing indicates that Suburban’s ability to provide safe and adequate water service to its customers has been severely compromised by the “abysmal” condition of the standpipe.

3. Staff's filing also states that the status of Suburban's system has not changed since Staff's Status Report filed on November 13, 2007, which indicates that Suburban is not willing to address the condition of the standpipe in a timely manner.

4. Therefore, the current condition of the standpipe poses an immediate threat to the health and safety of Suburban's customers which Suburban seems unwilling to address.

5. Due to the immediate threat to the health and safety of Suburban's customers who are being supplied water which has been compromised by the condition of the standpipe, Public Counsel supports Staff's motion for an evidentiary hearing in this case.

WHEREFORE, Public Counsel respectfully requests the Commission grant Staff's motion to set this matter for prehearing conference, establish a procedural schedule, and set an evidentiary hearing without further delay.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

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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 8th day of January 2008:

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