

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

In the Matter of Missouri-American Water)	
Company for Approval to Change its)	<u>Case No. WO-2006-0284</u>
Infrastructure System Replacement)	Tariff File No. YW-2006-0520
Surcharge (ISRS))	

MOTION TO SUSPEND TARIFF SHEET

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its Motion to Suspend Tariff Sheet ("Motion") states the following to the Missouri Public Service Commission ("Commission").

1. On January 3, 2006 (unless noted otherwise, all dates herein refer to the year 2006), Missouri-American Water Company ("MAWC") filed a petition to change its Infrastructure System Replacement Surcharge ("ISRS") under the provisions of Sections 393.1000, 393.1003 and 393.1006, RSMo (Supp. 2005). By that petition, MAWC is requesting that the Commission authorize it to establish an ISRS related to qualifying facility replacements. Along with its petition, MAWC also filed a revised tariff sheet to implement the requested ISRS.

2. Upon MAWC's petition being entered into the Commission's electronic filing and information system ("EFIS"), the instant case was opened. Upon the subject revised tariff sheet being entered into EFIS, it was assigned Tariff File No. YW-2006-0250.

3. Under the provisions of Section 393.1006.2(3), the Commission must act on MAWC's petition and tariff filing no later than 120 days after the filing date. In this instance, that means the Commission must issue a report and order regarding the petition and the subject revised tariff sheet no later than May 3.

4. On January 5, the Commission issued its **Order Directing Notice and Setting Intervention Date**, in which it established January 25 as the date by which applications to intervene

in the instant case were to be filed. No such applications were filed by the established deadline, nor have any been filed since that date.

5. In order for it to have time to review subject petition and revised tariff sheet, and the underlying supporting documentation, and to file a recommendation with the Commission, the Staff believes it is reasonable and necessary for the Commission to issue an order suspending the subject revised tariff sheet until May 3.

WHEREFORE, the Staff respectfully requests that the Commission issue an order suspending the revised tariff sheet that is one of the subjects of this case until May 3, 2006.

Respectfully Submitted,

/s/ Keith R. Krueger

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CERTIFICATE OF SERVICE

I hereby certify that copies of this Motion have been mailed with first class postage, hand-delivered, transmitted by facsimile or transmitted via e-mail to all counsel and/or parties of record this 27th day of January 2006.

/s/ Keith R. Krueger