

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

Dione C. Joyner,

Complainant,

v.

Missouri-American Water Company,

Respondent.

Case No. WC-2006-0345

MOTION TO REQUEST A STAFF INVESTIGATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and for its motion to request a staff investigation states to the Missouri Public Service Commission ("Commission") as follows:

1. On March 3, 2006¹, Dione C. Joyner ("Complainant") filed a formal complaint ("Complaint") against Missouri-American Water Company ("Respondent") on the basis of a billing dispute.

2. The Respondent filed its timely answer on April 6 that was delivered by certified mail on April 26. This answer disputes the basis for and substance of the Complaint.

3. Due to the notably different positions of the parties as to the cause of the Complaint, Staff requests the Commission order Staff to investigate and report its findings to the Commission. Pursuant to Commission Rule 4 CSR 240-2.070(10), the Commission "may order, at any time after the filing of a complaint, an investigation by its staff as to the cause of the complaint."

WHEREFORE, the Staff prays the Commission order an investigation by its Staff of this Complaint.

¹ Unless otherwise specified, all dates referred herein are in the year 2006.

Respectfully Submitted,

/s/ **Shelley E. Syler**

Shelley E. Syler

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Certificate of Service

I hereby certify that copies of this Response 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 20th day of July 2006.

/s/ **Shelley E. Syler**