JEROME A. DIEKEMPER CARY HAMMOND RICHARD SHINNERS JOHN A. TURCOTTE, JR. JOSEPH W. LARREW PAUL C. HETTERMAN JAN BOND JANET E. YOUNG GREG A. CAMPBELL KARL, SAUBER RICHARD P. PERKINS ANN G. DALTON JANINE M. MARTIN KIMBERLY J. BETTISWORTH SHERRIE A. SCHRODER JOHN RABBITT LARRY R. BORDNER KEVIN FAIRLIE VENUS V. HARRY JAGADEESH B. MANDAVA

DIEKEMPER, HAMMOND, SHINNERS, TURCOTTE AND LARREW, P.C.

ATTORNEYS AND COUNSELORS
SUITE 200
7730 CARONDELET AVENUE
ST. LOUIS (CLAYTON), MISSOURI 63105

* **(1013)** BOOM

(314) 727-1015 FAX (314) 727-6804 TOLL FREE 1-888-727-1015

December 5, 2003

FILED⁴
DEC 0 9 2003

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission PO Box 360 Jefferson City, MO 65102-0360 Missouri Public Service Commission

Re:

In the Matter of the General Rate Increase for Water and Sewer Service Provided by Missouri-American Water Company Case No. WR-2003-0500

Dear Judge Roberts:

I am enclosing an original and nine (9) copies of Statement of Position on Issues Filed By Utility Workers Union of America Local 335 in the referenced matter.

I would appreciate the Commission stamping a copy of this document as received and returning it to me in the enclosed stamped, self-addressed envelope.

Thank you for your cooperation in this matter.

Very truly yours,

JAN BOND

JB:nea

Enclosures

CC:

All counsel



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

STATEMENT OF POSITION ON ISSUES FILED BY UTILITY WORKERS UNION OF AMERICA LOCAL 335

COMES NOW Utility Workers Union of America Local 335, AFL-CIO (the "Union"), by counsel, and respectfully advises the Missouri Public Service Commission that the Union is not taking any position on any disputed issue. Additionally, for brevity and so as not to expand the record in this case unnecessarily, the Union respectfully requests the Commission to accept this style of filing rather than the normal style of filing of listing each issue and then the party's position on each issue.

JAN BOND, MBN 29227

DIEKEMPER, HAMMOND, SHINNERS,

TURCOTTE and LARREW, P.C.

7730 Carondelet Avenue, Suite 200

St. Louis, Missouri 63105

(314) 727-1015 (Telephone)

(314) 727-6804 (Fax)

janbond@dhstl.com (E-mail)

Attorneys for Utility Workers Union of America Local 335, AFL-CIO

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent by US mail, first-class postage pre-paid, this ______ day of December, 2003, to:

The Hon. Dale Hardy Roberts Secretary Missouri Public Service Commission PO Box 360 Jefferson City, MO 65102

Dana K. Joyce, Esq. General Counsel 200 Madison St., Ste. 800 Jefferson City, MO 65102

Mark W. Comley, Esq. City of Jefferson, MO 320 E. McCarty St. Jefferson City, MO 65101

Leland B. Curtis, Esq. City of Warrensburg 130 S. Bemiston, Ste. 200 St. Louis, MO 63105

Lisa C. Langeneckert, Esq. MO Energy Group Law Office of Robert C. Johnson 720 Olive St., 24th Fl. St. Louis, MO 63101

Karl Sobrist, Esq. St. Joseph Water Rate Coalition 2300 Main St., Ste. 1000 Kansas City, MO 64108 John B. Coffman, Esq. Office of the Public Counsel PO Box 7800 Jefferson City, MO 65102

James Fischer, Esq.
Public Water Supply District
No. 1 and 2 of Andrew Co./
Public Water Supply District
No. 1 of DeKalb County
101 Madison St., Ste. 400
Jefferson City, MO 65101

Jeremiah D. Finnegan, Esq. City of Riverside, MO 3100 Broadway, Ste. 1209 Kansas City, MO 64111

Stuart W. Conrad, Esq. AG Processing, Inc. 3100 Broadway, Ste. 1209 Kansas City, MO 64111

Dean L. Cooper, Esq. Brydon, Swearengen & England 312 E. Capitol Ave. Jefferson City, MO 65102 Diana M. Vulsteke, Esq. MO Industrial Energy Consumers 211 N. Broadway, Ste. 3600 St. Louis, MO 63102

James B. Deutsch, Esq. City of Joplin 308 E. High St., Ste. 301 Jefferson City, MO 65101

Ruth O'Neill, Esq. Office of the Public Counsel PO Box 7800 Jefferson City, MO 65102

David P. Abernathy, Esq. V.P. and General Counsel Missouri-American Water Co. 535 N. New Ballas Rd. St. Louis, MO 63141-6810

William R. England, III, Esq. Brydon, Swearengen & England 312 E. Capitol Ave. Jefferson City, MO 65102-0456

Jan Bond