

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

Ralph Rudolph,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>File No. WC-2022-0162</u></b>
	)	
Missouri-American Water Company,	)	
	)	
Respondent.	)	

**MOTION TO SUSPEND DATE FOR FILING OF PROPOSED PROCEDURAL  
CONFERENCE OR PROCEDURAL SCHEDULE**

COMES NOW Respondent Missouri-American Water Company (“MAWC” or “Company”), by and through the undersigned counsel, and, for its *Motion to Suspend Date for Filing of Proposed Procedural Conference or Procedural Schedule*, states to the Missouri Public Service Commission (“Commission”) as follows:

1. On March 7, 2022, the Commission issued its *Order Directing Filing of a proposed Procedural Conference Date or Procedural Schedule*. Therein, the Commission ordered that Staff file, no later than March 18, 2022, a proposed date and time for a procedural conference or a joint proposed procedural schedule in lieu of a procedural conference.

2. While not as well delineated as it could have been, MAWC notes that its *Answer to Complaint* filed on January 18, 2022 indicated that in the alternative to its Motion to Dismiss, MAWC asked that the Commission grant MAWC’s request for mediation Answer, p. 3, “Wherefore” paragraph).

3. The Commission’s *Notice of Small Formal Complaint and Order Directing Complainant Response, Respondent Answer, And Staff Investigation*, among other things, indicates that:

. . . either party may file a written request that the complaint be referred to a neutral third-party mediator for voluntary mediation of the complaint. Upon receipt of a request for mediation, the 30-day time period shall be tolled while the Commission ascertains whether both parties are willing to submit to voluntary mediation.

4. MAWC is not aware that such a determination has been made. Accordingly, MAWC asks that the Commission suspend the date for the filing of a proposed procedural conference or procedural schedule until it has been determined whether both parties are willing to submit to voluntary mediation.

5. Counsel for Staff has indicated that it supports this motion.

**WHEREFORE**, Missouri-American Water Company requests the Commission suspend the date for the filing of a proposed procedural conference or procedural schedule until it has been determined whether both parties are willing to submit to voluntary mediation.

Respectfully submitted,

**BRYDON, SWEARENGEN & ENGLAND, P.C.**

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**ATTORNEYS FOR MISSOURI AMERICAN  
WATER COMPANY**

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, this 17<sup>th</sup> day of March 2022.

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**/s/ Dean L. Cooper**