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FILED²

OCT 22 2001

Missouri Public
Service Commission

573 / 374-8761

FAX 573 / 374-4432

October 17, 2001

Hon. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Environmental Utilities, LLC WA-2002-65

Dear Judge Roberts:

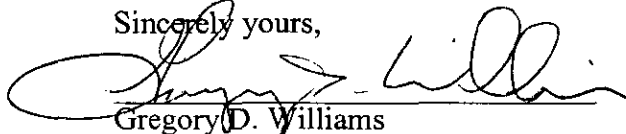
Please find enclosed for filing in the above referenced matter the original and 9 copies of the following pleadings:

1. Data Requests to Staff.
2. Data Requests to OPC.

An additional copy of each is also enclosed to be stamped "filed" and returned to me in the enclosed envelop.

A copy of the same has been mailed this date to counsel of record.

Sincerely yours,



Gregory D. Williams

Cc: Victoria Kizito, Gen. Counsel's Office
Ruth O'Neill, OPC

OCT 22 2001

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the application of Environmental Utilities, LLC)
 for permission, approval, and a certificate of convenience and)
 necessity authorizing it to construct, install, own, operate,) Case No. WA-2002-65
 control, manage and maintain a water system for the)
 public located in unincorporated portions of Camden County,)
 Missouri (Golden Glade Subdivision).)

ENVIRONMENTAL UTILITIES DATA REQUESTS TO OFFICE OF PUBLIC COUNSEL

Comes Now Environmental Utilities, LLC, Applicant in the above referenced case, and propounds the following Data Requests to the Office of Public Counsel to be answered within ten (10) days in accordance with the Rules and Regulations promulgated by the Public Service Commission in contested cases:

DATA REQUEST NO. 1: State whether you agree that a public need for water utility service exists within the proposed service area. If you do not so agree, please describe the factual information upon which you have relied to determine that no public need for water utility service exists. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO. 2: State whether you agree that the Applicant Environmental Utilities, LLC is qualified to provide public water utility service within the proposed service area. If you do not so agree, please describe the factual information upon which you have relied to determine that the Applicant is not qualified to provide water utility service. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO 3: State whether you agree that the Applicant Environmental Utilities, LLC has the financial ability to provide public water utility service within the proposed service area. If you do not so agree, please describe the factual information upon which you have relied to determine that the Applicant lacks the financial

ability to provide public water utility service within the proposed service area. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO. 4: State whether you agree that the proposed public water utility service described by the Applicant in the Application herein is economically feasible at the rates proposed in said Application. If you do not so agree, please describe the factual information upon which you have relied to determine that the proposed water utility is not economically feasible. If you believe that the Feasibility Study lacks material relevant information, please describe in detail the information you believe is omitted. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO. 5: State whether you agree that the Applicants proposed water utility service is in the public interest. If you do not so agree, please describe the factual information upon which you have relied to determine that the proposed water utility is not in the public interest. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO. 6: State whether the proposed tariff included with the Application in this case is reasonable and appropriate for the public water utility service proposed by the Applicant. If you do not agree that the same is reasonable and appropriate, please describe in detail by reference to specific tariff pages and rules the portions of said proposed tariff that you do not believe to be reasonable and appropriate, and further describe the modifications

to said tariff pages and/or rules that you believe are necessary to make said proposed tariff reasonable and appropriate. Attach additional pages to your response if necessary.

ANSWER:

DATA REQUEST NO. 7: Please identify the name, business address, and job title of each person who participated in the preparation of your Answers to these data requests, and identify the number of each data request that each such person participated in preparing. Attach additional pages to your response if necessary.

ANSWER:



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(573) 374-8761

CERTIFICATE OF SERVICE

I, Gregory D. Williams, do hereby certify that a true copy of the Application in the above captioned matter was on this 17 day of October, 2001, mailed, postage prepaid, to the following:

M. Ruth O'Neill
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Victoria Kizito
General Counsel, Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

And by e-mail transmission as follows:

vkizito@mail.state.mo.us
roneill1@mail.state.mo.us



Gregory D. Williams