

In the Matter of the Release of Staff's)
Audit Report Regarding Environmental) Case No. _____
Utilities, L.L.C., and Osage Water Company)

3. Staff desires that the Commission issue a Show Cause Order, as explained in its principal pleading referred to above, and require Environmental Utilities, L.L.C. ("EU"), to

respond in ten days. Staff further requests that the Commission complete contested case proceedings in this matter within 60 days from today.

4. The benefit that will accrue if this motion is granted will be the prompt revelation to the ratepayers of Osage Water Company ("OWC"), and to interested members of the general public and of the news media, of the manner in which EU managed OWC's affairs under an Operation and Maintenance Agreement ("O&M Agreement"), dated September 1, 2002, which authorized EU to "collect all revenues due and owing to Osage Water Company" and to "pay therefrom all expenses incurred in the operation of the water and sewer utility systems now owned by Osage Water Company" and to "reimburse therefrom the expenses incurred by Environmental Utilities, LLC" Staff's limited audit of EU and OWC, that is the subject of this proceeding, found that OWC was able to pay for water service provided to OWC by EU and that EU lacked good cause on December 12, 2005, to notify OWC that it was disconnecting its water service, effective December 27, 2005, for non-payment of \$5,009.67 for water service provided to OWC by EU, since it was EU, as manager of OWC under the O&M Agreement referred to above, that failed to pay EU as vendor of the water. Not only will there be no negative effect on the general public if the Commission acts by the desired date, there will be a beneficial effect on the general public.

5. The harm that will be avoided if this motion is granted will be the continued ignorance of OWC's ratepayers, and of interested members of the general public and of the news media, of the manner in which EU managed OWC's affairs as described above in Paragraph 4. In particular, Staff asserts that the Commission has a duty to the public to release Staff's Audit Report so that persons contemplating the purchase of homes or businesses in EU's certificated service area are fully informed with respect to the available water service and its management.

The undersigned states that, in January 2006, he attended a public meeting in Laurie, Missouri, in connection with another, related case and noted that some of the members of the public present complained that they had purchased their homes in ignorance of the ongoing problems with the water service. Staff asserts that there will be a negative effect on the general public if the Commission fails to act by the desired date in that there will be a loss of public confidence in the Commission's ability to protect ratepayers from non-compliant utilities.

6. This pleading is filed as soon as it could have been in that it was filed simultaneously with the principal pleading initiating the action to which it relates.

WHEREFORE, Staff prays that the Commission will grant its Motion for Expedited Treatment, open a contested case docket and issue an Order to EU requiring that it show cause within ten days, if any it has, why Staff's Audit Report should not be made public and, if EU timely responds, to convene a hearing and hold other appropriate proceedings, resulting in an Order under Section 386.480, RSMo, that Staff's Audit Report be made public, within 60 days of today's date; and grant such other and further relief as the Commission deems just in the circumstances.

Respectfully Submitted,

/s/ KEVIN A. THOMPSON

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was mailed, postage prepaid, by First Class United States Mail, as set out below, on this 17th day of March, 2006.

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/s/ KEVIN A. THOMPSON