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January 31, 2001

Missouri Public Service Commission
Attn: Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
200 Madison Street, Suite 100
P. O. Box 360
Jefferson City, MO 65102-0360

FILED

FEB 1 2001

Missouri Public
Service Commission

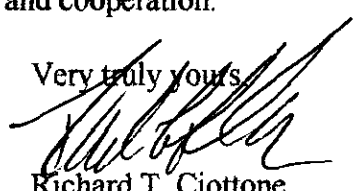
Re: Case No. WA-2001-288
Motion for Continuance

VIA EXPRESS MAIL

Dear Secretary Roberts:

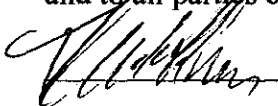
Enclosed for filing please find an original and eight copies of a Motion for Continuance in the above cause. Will you please see to it that this matter is brought to the attention of the Commission at your earliest convenience. Please note also, that as indicated in the application, correspondence should be addressed to the undersigned at the below address rather than to the letterhead address. Thank you for your assistance and cooperation.

Very truly yours,


Richard T. Ciottone
Attorney at Law
949 E. Essex Ave.
St. Louis, MO 63122
(314) 822-2355
fax (208) 275-0779

Certificate of Service

Copies of this transmittal and its attachments have on the date below indicated been provided to the Office of Public Counsel to the General Counsel to the Commission and to all parties of record.

 1/31/2001

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

FILED

FEB 1 2001

Missouri Public
Service Commission

In the Matter of the Application of St. Louis)
County Water Company, d/b/a Missouri-)
American Water Company, for Restatement)
And Clarification of its Certificate of)
Convenience and Necessity for St. Louis)
County, Missouri)

Case No. WA-2001-288

MOTION FOR CONTINUANCE

Come now St. Louis County Water Company, d/b/a Missouri-American Water Company ("Applicant"), and for its Motion for Continuance states:

1. All parties were represented by counsel at the prehearing conference in the above cause on January 25, 2001. The parties were required by Ordered Section 3 of its Order dated January 11, 2001 to file certain data with respect litigation of contested matters on or before February 1, 2001.

2. The parties were successful in negotiating a potential resolution of the instant matter, the terms of which are contained in the attached draft of a UNANIMOUS STIPULATION AND MOTION FOR PARTIAL SETTLEMENT AND CONTINUANCE OF REMAINING ISSUES. A counterpart of this document has been executed by attorneys for all parties, except that three attorneys representing certain municipalities were unable to execute the document until the municipalities they represent had the opportunity to approve their attorneys' recommendations.

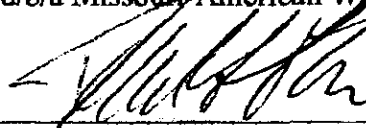
3. The Staff of the Commission has authorized the undersigned to represent their agreement with this instant Motion for Continuance.

WHEREFORE, Applicant prays for a continuance of the provisions of section Ordered 3 of the Commission's Order of January 11, 2001 in the instant case which would have required filings on or before February 1, 2001, and to permit

the required filings, or in lieu thereof a fully executed copy of the attached
Unanimous Stipulation, to be made on or before February 15, 2001.

Respectfully submitted,

ST. LOUIS COUNTY WATER COMPANY,
d/b/a Missouri American Water Company



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Certificate of Service

Copies of the foregoing have on
the date below written been sent
to all parties of record, including the
Office of Public Counsel and the
General Counsel to the Commission,
by prepaid U.S. Mail.

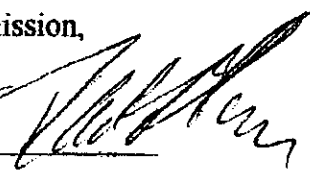
Jan. 3, 2001 

EXHIBIT A

Unexecuted ~~draft~~ for attachment to Motion for Continuance

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of St. Louis)	
County Water Company, d/b/a Missouri-)	
American Water Company, for Restatement)	Case No. WA-2001-288
And Clarification of its Certificate of)	
Convenience and Necessity for St. Louis)	
County, Missouri)	

UNANIMOUS STIPULATION AND MOTION FOR
PARTIAL SETTLEMENT AND CONTINUANCE OF REMAINING ISSUES

Come now St. Louis County Water Company, d/b/a Missouri-American Water Company ("Applicant"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of Public Counsel ("OPC"), the Intervenor Cities of Winchester and Maryland Heights, the City of Chesterfield, the City of St. Ann, and the Cities and Villages of Ballwin, Bel-Nor, Bel-Ridge, Bella Villa, Bellerive, Bellefontaine Neighbors, Breckenridge Hills, Clayton, Cool Valley, Crestwood, Des Peres, Green Park, Hazelwood, Manchester, Maplewood, Normandy, Pasadena Hills, Pine Lawn, Richmond Heights, Riverview, Rock Hill, Town and Country, University City, Velda City, and Wildwood ("Intervenor Cities") all of whom shall be referred to herein collectively as "the Parties", and herewith file the following Unanimous Stipulation and Motion for Partial Settlement and Continuance of Remaining Issues, to wit:

1. All parties were represented by counsel at the prehearing conference in the above cause on January 25, 2001. The instant motion is the product of negotiations at that prehearing conference.

2. Certain of the Parties have expressed concerns with regard to settlement of the Applicant's Application for various reasons, perhaps the most significant of which being the absence of municipal franchise agreements with various Intervenor Cities and the impact the Commission's grant of Applicant's prayer might have on that issue; and

3. The Parties believe, that given adequate time, these concerns may be resolved by, inter alia, the negotiation of franchise agreements with some or all Intervenor Cities acceptable to Applicant and those respective Cities; and

4. The Parties agree that ninety days will be necessary to determine whether the expressed concerns of the various parties can be sufficiently addressed to permit them to withdraw their concerns to Applicant's prayer as it relates to a Certificate of Convenience and Necessity for the entirety of St. Louis County; and

5. As stated in Applicant's Application (paragraphs 4 and 5), the reason the Application was filed at this time is the impending purchase of the water utility assets of the City of Valley Park, Missouri, the consummation of which is dependent on the acquisition of a Certificate of Convenience and Necessity for that City; and

6. Applicant has heretofore represented by its verified Application that it has reached agreement in principle to the terms of sale with the City of Valley Park, and the City has granted Applicant a municipal franchise dated November 20, 2000, a copy of which is attached hereto as Exhibit A.

7. The Parties agree that their above mentioned concerns do not affect Applicant's alternative prayer in its Application which states:

.....Applicant prays for a Certificate of Convenience and Necessity for the entirety of the City of Valley Park, Missouri so that it may complete the acquisition of the water distribution system assets presently operated by the City.

and that accordingly, no party has any opposition to the immediate grant of Applicant's prayer for a Certificate of Convenience and Necessity for the City of Valley Park and the filing of tariff sheets depicting such service area.

8. If the concerns of all Parties can be met within the ninety-day continuance herewith requested, the preparation and filing of the information required in ORDERED 3 of the Commission's Order of January 11, 2001 will be unnecessary. If the concerns of all Parties cannot be met which would permit them to endorse the remainder of Applicant's prayer, Applicant indicates that there is some question as to whether or not Applicant will proceed further with the Application.

WHEREFORE, the Parties herewith move the Commission by the instant unanimous stipulation that: 1) There is no opposition to the immediate grant of Applicant's prayer for a Certificate of Convenience and Necessity for the City of Valley Park, Missouri and no opposition to the filing of appropriate tariff sheets; and, 2) that the Commission should continue the requirements of ORDERED 3 of the Commission's Order of January 11, 2001 for ninety days following the Commission's ruling on this motion to permit the Parties to resolve all remaining issues in this Application

(signatures of all parties)