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April 15, 2005

FILED

APR 1 5 2005

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Secretary/Chief Administrative Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

Re: In the Matter of Nathan G. Godsy and Leah N. Godsy v. Philadelphia Suburban Corporation d/b/a AquaSource Development.

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Motion For Expedited Treatment.

Thank you for seeing this filed.

Sincerely,

Lisa Cole Chase

LCC:sjo

enclosure

CC: PSC General Counsel OPC General Counsel Nathan G. Godsy Leah N. Godsy

FILED

## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

APR 1 5 2005

Nathan G. Godsy and Leah N. Godsy,	)	Service Commission
v.	) Case No.	
Philadelphia Suburban Corporation,	)	
d/b/a AquaSource Development,	)	
AquaSource/RU, AquaSource/CU,	)	
AquaSource, and/or Aqua Missouri,	)	
Inc.	)	

### MOTION FOR EXPEDITED TREATMENT

COMES NOW Nathan and Leah Godsy, ("Complainants") pursuant to 4 CSR 240-2.080(16), and for their Motion for Expedited Treatment state to the Commission as follows:

- 1. This Motion for Expedited Treatment is being filed at the same time as Complainants filed their Complaint in the above reference matter, and hereby request the Commission Order AquaSource to immediately permit Complainants to hook up to AquaSource's collective sewer system and to provide safe and adequate sewer services to the property located at 711 Oak Point Road, Jefferson City, Mo 65101 no later than May 15, 2005.
- 2. The property located at 711 Oak Point Road is near substantial completion and ready for the homeowner's sewer line to be attached to AquaSource's collective sewer system. An Order requiring the immediate hook up of the property to AquaSource's facilities will enable the Cole County building code inspector to issue a permit for residency which would otherwise be denied for lack of sewer service, and thereby deprive the homeowners of the ability to occupy their new home. An Order requiring

AquaSource to immediately hook up the single family residence at 711 Oak Point Road,

Jefferson City, will have no negative effect on AquaSource's customers or the general

public.

3. This pleading has been filed as soon as it could be filed. Complainants' Agent paid AquaSource for this service by check in October 2004, and were not notified of AquaSource's refusal to provide service until the check was returned in February 2005. Complainants have tried negotiating this issue with AquaSource, but such negotiations have broken down. AquaSource has recently ceased negotiations and discussions and the Complainants have no other option than to file their complaint. Based on the latest stance taken by AquaSource, Complainants filed their Complaint and this Motion for Expedited Treatment as soon as it could be filed.

WHEREFORE, the Complainants hereby request the Commission grant this Motion for Expedited Treatment and Order AquaSource to immediately permit Complainants to hook up to AquaSource's collective sewer system and to provide safe and adequate sewer services to the property located at 711 Oak Point Road, Jefferson City, Mo 65101 no later than May 15, 2005.

Respectfully Submitted,

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

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#### ATTORNEYS FOR COMPLAINANTS

#### CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 15th day of April, 2005, to the following parties to:

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

General Counsel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102