

LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101
FAX: (314) 588-0638

Robert C. Johnson
DIRECT: (314) 345-6436
E-MAIL: bjohnson@bspmlaw.com

Lisa C. Langeneckert
DIRECT: (314) 345-6441
E-MAIL: llangeneckert@bspmlaw.com

August 23, 2001

FILED²

AUG 24 2001

Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: St. Louis County Water Merger Case WM-2001-309

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Position Statement. An additional copy of this document is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (11)
cc/enc: All parties of record
VIA OVERNIGHT MAIL

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

AUG 24 2001

Missouri Public
Service Commission

Case No. WM-2001-309

In the Matter of the Joint Application)
of Missouri-American Water Company, St.)
Louis County Water Company d/b/a)
Missouri-American Water Company and)
Jefferson City Water Works Company)
d/b/a Missouri-American Water Company)
for Authority to Merge St. Louis County)
Water Company d/b/a Missouri-American)
Water Company with and into)
Missouri-American Water Company and, in)
Connection therewith Certain Other)
Related Transactions)

**POSITION STATEMENT
OF MISSOURI ENERGY GROUP**

COMES NOW, the Missouri Energy Group ("MEG") and for its Position Statement on the Issues states as follows:

1. Issue: Are the proposed merger transactions with MAWC as the surviving entity not detrimental to the public interest?

MEG Position: The MEG is in opposition to any restructuring change that would be detrimental to the public interest by increasing future rates.

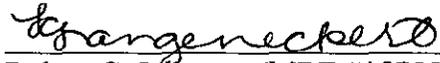
2. Issue: Are conditions necessary to ensure that the public interest is not harmed by these proposed transactions? If so, what conditions proposed by the Staff and OPC should be implemented by the Commission to ensure that the public interest in Missouri is protected?

MEG Position: The MEG, at this time, takes no position on this issue in this case, but reserves the right to take a position on this and any other matters disclosed in the hearing.

22

3. The MEG reserves the right to cross examine any witness to this case.

Respectfully Submitted,



Robert C. Johnson (MBE #15755)
(314) 345-6435 (Direct Dial)
bjohnson@bspmlaw.com

Lisa C. Langeneckert (MBE #49781)
(314) 345-6441 (Direct Dial)
llangeneckert@bspmlaw.com
720 Olive Street, 24th Floor
St. Louis, MO 63101
(314) 588-0638 (fax)

Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. WM-2001-309.

Dated at St. Louis, Missouri this 23rd day of August, 2001:

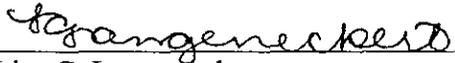
David P. Abernathy, Esq.
535 North New Ballas Road
St. Louis, MO 63141

Jan Bond, Esq.
Diekemper, Hammond, Shinnors
Turcotte and Larrew, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, MO 63105

Dean L. Cooper, Esq.
Brydon, Swearngen & England
312 East Capitol Avenue
P.O. Box 456
Jefferson City MO 65102

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

Clifford Snodgrass, Esq.
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102



Lisa C. Langeneckert