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ATTORNEYS AT LAW

December 20, 2006

Colleen M. Dale
Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102-0360

FILED²
DEC 23 2006
Missouri Public
Service Commission

**Re: Metropolitan St. Louis Sewer District v. Missouri American Water
Case No. WC-2007-0040**

Dear Ms. Dale:

Enclosed herewith, please find Complainant's Answers and Objections to Respondent's Third Set of Data Requests to be filed in the above-referenced matter. Please file the original with the Commission and return the extra copies to me file-stamped in the enclosed, self-addressed, stamped envelope.

Thank you for your cooperation.

Very truly yours,

Byron E. Francis

BEF/ljs
Enclosures
Cc: Kenneth C. Jones
Lewis R. Mills, Jr.
Kevin A. Thompson

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

DEC 28 2006

Missouri Public
Service Commission

Metropolitan St. Louis Sewer District,

Complainant,

v.

Missouri American Water Company,

Respondent.

Case No. WC -2007-0040

**COMPLAINANT'S ANSWERS AND OBJECTIONS TO RESPONDENT'S
THIRD SET OF DATA REQUESTS**

COMES NOW Complainant, Metropolitan St. Louis Sewer District ("MSD"), and for its answers and objections to Respondent's Third Set of Data Requests, states as follows:

GENERAL OBJECTIONS

1. MSD incorporates by reference each of the General Objections set forth in its Answers and Objections to Respondent's First and Second Set of Data Requests as though such General Objections were set forth herein.

2. MSD reserves the right to amend or supplement these answers to reflect information gathered in discovery, if it finds that inadvertent errors or admissions have been made, and/or more accurate information becomes available at a later date.

The following responses reflect MSD's best present knowledge, information and belief based on a reasonably diligent search. MSD reserves the right to change, modify or supplement these answers based on further discovery or on facts or circumstances that hereafter may come to MSD's knowledge and attention. Nothing in these responses should be construed as waiving any rights or objections that otherwise might be available to MSD, and MSD's answer to any of these Data Requests should not be deemed an admission of relevancy, materiality, authenticity or admissibility in evidence of the discovery or the responses thereto.

DATA REQUESTS

1. Please state whose handwriting appears on the following documents produced by MSD to MAWC on November 29, 2006:

ANSWER:

| | |
|--------------|-------------------------------------|
| MSD00027 | Unknown |
| MSD00029 | Unknown |
| MSD00033-34 | Jan Zimmerman |
| MSD00107 | Randy Hayman |
| MSD00380 | Jan Zimmerman and Theresa Bellville |
| MSD00382 | Jan Zimmerman |
| MSD00390-391 | Jan Zimmerman |
| MSD00396-401 | Jan Zimmerman |
| MSD00404-405 | Jan Zimmerman |
| MSD00408 | Jan Zimmerman |
| MSD00412-417 | Jan Zimmerman |
| MSD00556 | Jan Zimmerman |
| MSD00561-565 | Jan Zimmerman |
| MSD00572 | Jan Zimmerman |
| MSD00575 | Jan Zimmerman |
| MSD00578-579 | Jan Zimmerman |
| MSD00581 | Jan Zimmerman |

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ATTORNEYS FOR COMPLAINANT

CERTIFICATE OF SERVICE

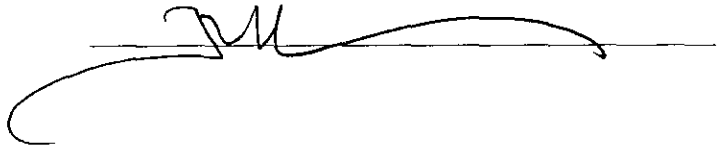
The undersigned hereby certifies that a true and accurate copy of Complainant's Answers and Objections to Respondent's Third Set of Data Requests has been served via e-mail and U.S. Mail, postage prepaid, this 20th day of December, 2006, upon the following party of record:

Kenneth C. Jones
Missouri-American Water Company
727 Craig Road
St. Louis, MO 63141

And by U.S. Mail, postage prepaid upon the following parties of record:

Lewis R. Mills, Jr.
Public Counsel
Office of the Public Counsel
P. O. Box 2230
Jefferson City, MO 65102

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

A handwritten signature in black ink, appearing to be 'JH', is written over a horizontal line.