

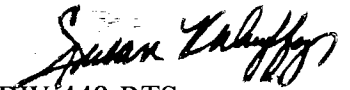
BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

MAR 10 2011

In the Matter of the Application of Suburban)
Water, Inc. d/b/a Suburban Water Company)
for an Order Increasing its Rates in)
Leavenworth County, Kansas.)

Docket No. 11-SUBW-448-RTS



**STAFF MOTION REQUESTING LEAVE TO FILE TESTIMONY, REQUESTING
LEAVE FOR THE CITIZENS' UTILITY RATEPAYER BOARD AND SUBURBAN
WATER COMPANY, INC. TO FILE RESPONSIVE TESTIMONY, AND REQUESTING
THE COMMISSION ISSUE AN INTERIM ORDER ON APPLICATION BY 04/15/11**

COMES NOW the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) requests the Commission grant it leave to file its recommendation in this docket in the form of written direct testimony, requests leave of the Commission to allow Suburban Water Company, Inc. (Suburban) and the Citizens' Utility Ratepayer Board (CURB) to file responsive testimony, and requests the Commission, if practicable, issue an interim order on Suburban's application on April 15, 2011. In support of its motion, Staff shows the Commission as follows:

1. On November 3, 2011, in Docket No. 10-SUBW-602-TAR, the Commission issued an order denying Suburban's request for a purchased water adjustment (PWA). In that order the Commission laid out several concerns with respect to Suburban's request for a PWA and, in accordance with those concerns, directed Suburban to work with Staff to make an abbreviated rate case-type filing under K.A.R. 82-1-231b.

2. Staff engaged in conversations with Suburban representatives and sent Suburban a letter November 23, 2010 in which it laid out possible dates that would fit into a K.A.R. 82-1-231b procedure. Those dates included Suburban filing its application approximately December

13, 2010, with Staff making to the Commission the recommendation referred to in K.A.R. 82-1-231b(c)(3) approximately March 3, 2011. That approximate timeline also assumed a possible Commission interim order, as required by K.A.R. 82-1-231b(c)(6)(A), on April 2, 2011.

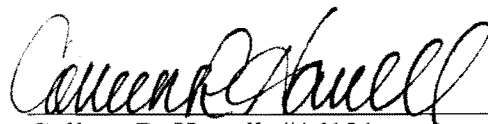
3. Staff is, by this motion, requesting the Commission allow it to file its recommendation in written testimony format. Staff believes this format would be of the most benefit to the Commission and parties to the docket, alike. Staff suggests that it be allowed to file its written testimony on Wednesday, March 16, 2011, and suggests that it provide that testimony to Suburban, CURB, and the Commission's advisory counsel in an electronic format.

4. In conversations, CURB and Suburban have requested that they be allowed to respond to Staff testimony also in testimony format. As a result, Staff suggests that CURB and Suburban responsive testimony be filed on Wednesday, March 30, 2011, and provided to other parties and advisory counsel via electronic means on that date, as well.

5. Finally, Staff suggests that the Commission's interim order be entered, if possible, on Friday, April 15, 2011.

WHEREFORE Staff requests the Commission consider its motion, as set out above, and for such other and further relief as the Commission deems just and proper.

Respectfully submitted,



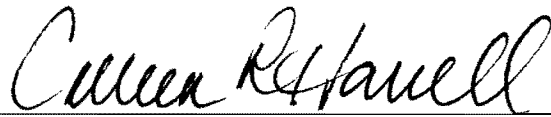
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VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

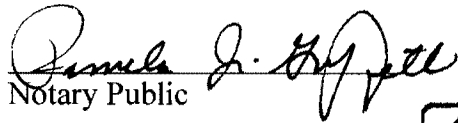
Colleen R. Harrell, of lawful age being first duly sworn upon oath states:

That she is the attorney for the Corporation Commission Staff in this matter; that she has read and is familiar with the foregoing Motion and that the statements made therein are true and correct to the best of her information, knowledge and belief.

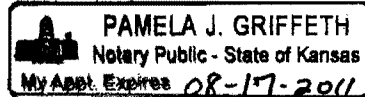


Colleen R. Harrell

Subscribed and sworn to before me Thursday, March 10, 2011.


Notary Public

My appointment expires:



CERTIFICATE OF SERVICE

11-SUBW-448-RTS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Staff's Motion Requesting Leave to File Testimony, Requesting Leave for Citizens' Utility Ratepayer Board and Suburban Water Company, Inc. to File Responsive Testimony, and Requesting The Commission Issue an Interim Order on Application by 04/15/11 was placed in the United States mail, postage prepaid, or hand-delivered this 10th day of March, 2011, to the following:

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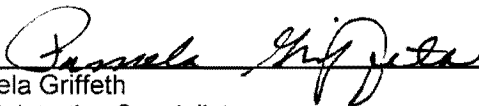
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