

**STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of Missouri-American)	WR-2003-0500
Water Company's Tariff to Revise)	Tariff Nos.
Water and Sewer Rate Schedules)	YW-2003-2012
)	YW-2003-2013
)	YW-2003-2014
)	YW-2003-2015

**APPLICATION TO INTERVENE
OF AG PROCESSING INC, A COOPERATIVE**

This application requests intervention in this proceeding for AG PROCESSING INC, A COOPERATIVE ("AGP"). Pursuant to 4 C.S.R. 240-2.075 AGP applies to intervene and to become a party in this proceeding. In support, AGP states:

1. AGP is an agricultural cooperative and is a large manufacturer and processor of soybean meal, soy-related food products, and other grain products throughout the central and upper Midwest, including the State of Missouri. AGP is the largest cooperative soybean processing company in the world, the third-largest supplier of refined vegetable oil in the United States and the third-largest commercial feed manufacturer in North America.

2. AGP operates a major processing facility in St. Joseph, Missouri where it is a major industrial water supply customer of Missouri-American Water Company ("Missouri-American") in the St. Joseph district.

3. AGP's interest in proceedings affecting the rates, terms and conditions of water services from Missouri-American

have been previously recognized by the Missouri Public Service Commission in permitting AGP's intervention in prior Missouri-American rate design and rate-related proceedings. AGP has actively participated in such cases.

4. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Stuart W. Conrad, Esq.
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3100 Broadway
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and to:

Mr. Gary Chesnut
Corporate Purchasing Manager
Ag Processing Inc.
12700 West Dodge Rd.
Omaha, NE 68154

5. On May 19, 2003 Missouri-American filed proposed tariffs reflecting an annual increase of \$20 million or 12.2%. Initial investigation and review of these proposed tariffs and the accompanying materials indicates that they have not been shown to be just and reasonable and may be unjust, unreasonable, and unduly discriminatory.

6. The Missouri Public Service Commission issued an Order on May 29, 2003 suspending the proposed rates and tariffs through April 16, 2004, directing an investigation of the proposals, setting an intervention deadline, scheduling a hearing, and

an early prehearing conference. This application is timely under that Order.

7. AGP is vitally interested in issues that are or may be raised by or developed as a result of the investigation of Missouri-American's filing for an increase in its rates and revenues, including, without limitation, (1) the revenues which will or may be realized under such rates and the increase over revenues resulting from former rates in effect before the current filing,^{1/} (2) the amount and prudence of expenses and purported matching revenues to be charged to the appropriate test period, and (3) the design and structure of rates needed to raise revenues sufficient to meet a proper cost of service for Missouri-American.

8. AGP will be bound or adversely affected by any Commission order in this proceeding. Because of the structure of the rate schedules under which Missouri-American sells water to AGP, and because of AGP's size and consistency of water usage for production purposes, AGP is in the special position of representing its own interest that is direct, immediate, different from that of the general public, and that cannot adequately be represented by any other party. Therefore, it will aid the Commission and serve and protect the public interest that AGP be permitted to intervene in this proceeding to protect its interests.

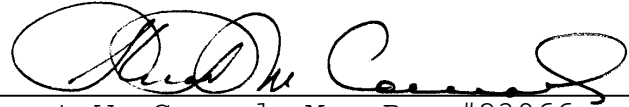
^{1/} The prior Missouri-American rate case, WR-2000-281, has been remanded to the Commission for further proceedings. AGP is a party to that proceeding and contends that the rates approved in that case were unjust and unreasonable.

9. For purposes of 4 C.S.R. 240-2.075(2), AGP states that it opposes the discriminatory and excessive pricing of public utility services, including those provided by Missouri-American and therefore opposes the relief sought by Missouri-American in this proceeding.

WHEREFORE, AGP prays: (a) that it be permitted to intervene and be a party to this case with all rights to have notice of and participate in any proceedings and hearings to present evidence, to cross-examine witnesses, file briefs and present any argument; and (b) for all other relief to which AGP is entitled.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

A handwritten signature in dark ink, appearing to read "Stuart W. Conrad", is written over a horizontal line.

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ATTORNEYS FOR AG PROCESSING INC.

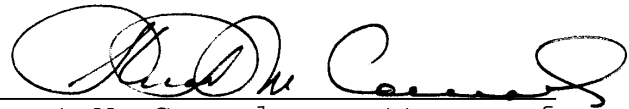
CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Application to Intervene on each of the following persons either by postage-paid U.S. mail, by e-mail or facsimile.

Office of the Public Counsel
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W. R. England III, Esq.
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Dated: June 5, 2003

A handwritten signature in black ink, appearing to read "Stuart W. Conrad", written over a horizontal line.

Stuart W. Conrad, an attorney for
within applicant