

STATE OF MISSOURI  
MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Missouri-American	)	
Water Company's Request for Author-	)	
ity to Implement a General Rate	)	WR-2010-0131
Increase for Water Service Provided	)	
in Missouri Service Areas	)	

**REQUEST FOR SUSPENSION OF PROPOSED TARIFF BY  
AG PROCESSING INC A COOPERATIVE**

This pleading by AG PROCESSING INC A COOPERATIVE ("AGP") requests suspension for the maximum statutory period of the proposed tariffs that were filed by Missouri-American Water Company ("MAWC") on October 30, 2008. In support of its request AGP states:

1. AGP earlier filed an Application to Intervene in this proceeding. The statements made in that Application are incorporated herein by reference.

2. Absent Commission action to suspend them, the proposed tariffs will take effect on November 29, 2009. The increase proposed is certainly significant; the reasonableness of this proposed increase has not been shown nor have MAWC's testimony and filings been verified or reviewed. There is insufficient time between this date and November 29, 2009 to permit any meaningful investigation or review of the basis of this proposed rate increase.

3. Issues that require time to investigate include but are not limited to the following:

a. MAWC appears to have excluded an appropriate level of revenues from certain industrial customers in the St. Joseph service area. The result of this exclusion is to incorrectly state class revenues and thus lead to an incorrect conclusion regarding whether that class of customer is needful of any increase at all.

b. MAWC appears at this time to have employed load data from areas or regions other than the St. Joseph service area to calculate appropriate levels of revenue and appropriate rate design to the St. Joseph service territory.

c. MAWC may have included inappropriate and potentially imprudent expenditures in the presentation of its June 30, 2009 "per book" investment, revenues and expenses leading to an inappropriate base on which to establish just and reasonable rates going forward.

d. MAWC appears to have calculated its claimed need for additional revenue using an excessive rate of return on common equity leading to an overstatement of its claims for additional revenue.

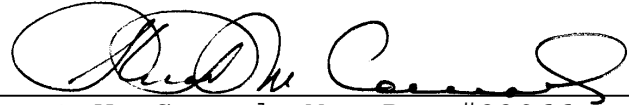
e. MAWC may have misclassified customers into revenue groupings without any basis for such classification leading to incorrect conclusions regarding the need for additional revenue from those classes.

WHEREFORE, without prejudice to later requests for relief as they may appear, AGP prays: (a) that the proposed tariffs filed in by MAWC on October 30, 2009 be suspended for the

full statutory period permitted; (b) that the Commission Staff be directed to investigate MAWC's claims; (c) that notice of the filing be directed to be sent to all public entities in the service territories affected; (d) that parties desiring to intervene be permitted to do so; (e) that public hearings at appropriate times and places in the affected service territories and particularly in the St. Joseph service territory be ordered; and (f) that all other needful relief to permit the full investigation of these claims and the protection of the interest of ratepayers be accomodated.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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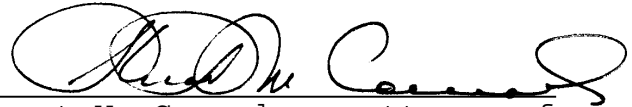
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ATTORNEYS FOR AG PROCESSING INC A  
COOPERATIVE

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Application to Intervene on the designated attorneys or representatives of each party in accord with Commission Orders and the service list maintained in this proceeding by the Secretary of the Commission on EFIS.

Dated: November 14, 2009

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

Stuart W. Conrad, an attorney for  
within movant/requesting entity