

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Meramec Sewer Company)
Rate Increase Request) Case No. SR-2012-0309

**APPLICATION FOR INTERVENTION OF JEFFERSON COUNTY, MISSOURI
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Jefferson County, Missouri, pursuant to 4 CSR 240-2.075, and for its Application for Intervention and Motion for Expedited Treatment in this case, states as follows:

1. Jefferson County is a Home Rule Charter County of the First Class located in Eastern Missouri with the County Seat located in Hillsboro, Missouri. Relevant to this proceeding, Meramec Sewer Company (“Meramec”) is entirely located within Jefferson County. (See, Meramec Tariff, P.S.C. Mo. No. 1, Sheet No. 2).

2. On March 5, 2012, Meramec filed a letter in the above-captioned docket seeking to increase sewer revenues by approximately 74%. In that letter, Meramec also notes that it is not current on its Commission annual assessments.

3. As with most utilities, Meramec’s tariffs provide for rates that are exclusive of municipal, county, state or federal taxes. Instead, those tariffs direct Meramec to collect taxes as a separate item on the customers’ bills. (See, Meramec Tariff, P.S.C. Mo. No. 1, Sheet No. 5). Despite this Commission directive, Meramec has either not billed customers for these taxes or has billed customers and has not remitted the tax to the county taxing authority. Under any circumstance, Meramec has not paid its county taxes for the past 3 years and currently owes over \$72,000 in past due taxes to

Jefferson County. In addition, this amount continues to accrue interest and past due penalties.

4. Jefferson County is interested in intervening in this docket for the purpose of working with Meramec, the Commission and the parties in establishing a mechanism for the payment of these past due county taxes. In addition, Jefferson County is interested in assisting the parties in establishing a procedure by which Meramec taxes and assessments are paid on a regular basis and similar problems are avoided in the future. In this way, Jefferson County has an interest in this proceeding that differs from that of the general public. Absent a mechanism for the immediate payment of these past due taxes, Jefferson County also seeks, to the extent necessary, Commission authority to perfect its lien (and that of the State of Missouri) for the taxes, interest and penalties due and owing Jefferson County and to sell Meramec assets pursuant to Section 140.150 RSMO et seq.

5. Jefferson County's intervention will serve the public interest by ensuring that this Commission regulated utility properly pays its county taxes. Absent such payment, Jefferson County will be required to avail itself of other legal remedies including the possible forced sale of utility assets. Such a sale may cause interruptions in Meramec's provision of safe and adequate utility service.

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

David L. Woodsmall (#40747)
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807 Winston Court
Jefferson City, Missouri 65101
Voice: (573) 797-0005
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and

Carl W. "Wes" Yates III (#43260)
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7. Pursuant to 4 CSR 240-2.080(14), Jefferson County requests that the Commission act on this request in an expedited manner. In support of this request, Jefferson County points out that it only recently became aware of this rate proceeding and the possibility that it may serve as the vehicle to resolve this problem. Jefferson County further notes that the Commission's standard timeline for the processing of informal water / sewer rate cases calls for Staff to complete its audit and share the results of that audit with OPC and Meramec on June 18, 2012. Shortly thereafter, Staff is scheduled to present its settlement proposal to OPC and Meramec. By acting in an expedited fashion, the Commission can ensure that Jefferson County is included in those discussions and that this problem is resolved within the context of this case. With this in mind, Jefferson County asks that the Commission grant this pleading on or before its next regularly scheduled public meeting on June 20, 2012.

WHEREFORE, Jefferson County respectfully requests that the Commission issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,



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ATTORNEYS FOR JEFFERSON COUNTY,
MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to the following parties of record as provided by the Secretary of the Commission.

Goldie Tompkins
Staff Counsel's Office
Missouri Public Service Commission
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Lewis R. Mills, Jr.
Office of the Public Counsel
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102

Meramec Sewer Company
Department Legal
P.O. Box 625
381 Green Jade Estates Drive
Fenton, MO 63026

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written over a horizontal line.

David L. Woodsmall

Dated: June 13, 2012