

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

In the Matter of the Joint Application of House)	
Springs Sewer Company, Inc., and Jefferson County)	<u>File No. SM-2016-0204</u>
Public Sewer District for Approval of House Springs)	
Sewer Company, Inc., to Sell Company Assets to)	
Jefferson County Public Sewer District, in Connection)	
with Other Related Transactions.)	

MOTION TO INTERVENE

COME NOW INTERVENORS, County of Jefferson, Missouri and Delinquent Tax Trustee of Jefferson County, Missouri, pursuant to 4 CSR 240-2.075, and hereby respectfully request an Order from the Missouri Public Service Commission granting them a limited intervention in the above-captioned matter. In support of this Motion, Intervenor aver the following:

- 1) The legal names of the parties seeking to intervene in the above captioned proceeding are:
 - a. County of Jefferson, Missouri, and
 - b. Delinquent Tax Trustee for Jefferson County, Missouri.
- 2) Proposed Intervenor County of Jefferson, Missouri, and Delinquent Tax Trustee of Jefferson County, Missouri, have an interest in the above-captioned matter because they are legal owners of certain real estate lying and being in the County of Jefferson, Missouri, the which is claimed to be owned, and proposed to be sold, by House Springs Sewer Company, Inc., such real estate having the following legal descriptions:

- a. Meadow Brook Estates Lot 98 Sewer Treatment Facilities (House Springs Sewer) Section 23 Township 42 Range 4 .95 Acres
Parcel Number 07 6.0 23.0 001.85B (1990)
 - b. Meadow Brook Estates Lot 98 Section 23 Township 42 Range 4 .95 Acres
Parcel Number 07 6.0 23.0 001.85A (1990)
 - c. Meadow Brook Estates Lot 98 Section 23 Township 42 Range 4 .95 Acres
Parcel Number 07 6.0 23.0 001.85 (1991;1992;1993; and 1994)
- 3) Proposed Intervenor seek, therefore, to intervene in the proposed transaction, in order to protect their property rights to the real estate described in paragraph 2, above.
 - 4) Proposed Intervenor object to the sale of the assets owned by the County of Jefferson, Missouri, and/or the Delinquent Tax Trustee of Jefferson County, Missouri, by House Springs Sewer Company, Inc., to Jefferson County Public Sewer District.
 - 5) The intervention of the proposed Intervenor will not unduly delay or prejudice the adjudication of the rights and duties of the original parties in the above-captioned matter.

WHEREFORE, proposed Intervenor respectfully request an Order from the Missouri Public Service Commission, (1) granting them a limited intervention in the above-captioned matter and (2) permitting them to file pleadings in the above-captioned matter objecting to the sale of assets owned by Intervenor in the above captioned matter, and (3) for such other and further relief as is just and proper.

Respectfully submitted,

CARL W. YATES, III,
COUNTY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2016, a copy of this Entry of Appearance, was served via U.S. mail, first class, postage prepaid, upon the following parties:

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