

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of Missouri American	)	
Water Company's Request for	)	
Authority to Implement a General Rate	)	WR-2008-0311
Increase for Water Service Provided	)	
in Missouri Service Areas	)	

APPLICATION TO INTERVENE
OF
THE CITY OF RIVERSIDE MISSOURI
AND
THE MISSOURI GAMING COMPANY

COMES NOW, the City of Riverside Missouri, a fourth class city and the Missouri Gaming Company, a Missouri company d/b/a the Argosy Casino ("MGC"), by and through undersigned counsel and pursuant to 4 C.S.R. 240-2.075 applies to intervene in the above titled case. The following suggestions are offered in support thereof:

1. The City of Riverside is a fourth class city in the county of Platte, state of Missouri, ("Riverside") and as such is within the service area of Missouri-American Water ("MAWC").
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Joseph P. Bednar, Jr.
John W. McClelland
Matthew D. Turner
Armstrong Teasdale LLP
3405 West Truman Boulevard
Suite 210
Jefferson City, MO 65109

Telephone No.: (573) 636-8394
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3. The Missouri Gaming Company is a Missouri company d/b/a the Argosy Casino (“MGC”), and is located within the territorial limits of the City of Riverside, Missouri and as such is within the service area of MAWC.

4. Riverside’s interest in the case is to oppose the tariff proposed by MAWC in YW-2008-0594 of the above titled case as a city within the described service area who would be subject to such unreasonable and unjust tariff if this Commission grants MAWC’s request.

5. MGC’s interest in the case is to oppose the tariff proposed by MAWC in YW-2008-0594 of the above titled case as a business who would be subject to such unreasonable and unjust tariff if this Commission grants MAWC’s request.

6. MAWC has chosen to file such application in a manner that requires Riverside and MGC to intervene to protect their unique interests as a particular fourth class municipality and a particular business in one of the multiple proposed tariffs of MAWC.

7. Riverside is interested in the impact of any decisions in this proceeding on behalf of itself and its citizens and businesses, who likewise receive their water service from MAWC. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

8. Riverside states, pursuant to 4 CSR 240-2.075(2), that it is opposed to any unreasonable or unjust increase in water rates that would create financial hardship or undue discrimination to its citizens and businesses, and to Riverside itself.

9. The granting of the proposed intervention would serve the public interest.

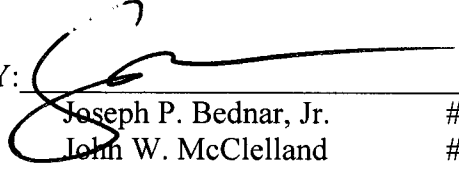
10. The MGC is a public company located within the City of Riverside, State of Missouri, that has purchased substantial amounts of water from MAWC.

11. As large-use customers, the rates and terms and conditions of the water service of Applicants may be substantially and uniquely affected by the outcome of this case. MGC's interests in this matter cannot be adequately represented by any other party.

WHEREFORE, for the foregoing reasons, Riverside and MGC, respectfully requests that the Commission grant their Application to Intervene in this matter, and thereby entitle the City and MGC to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

ARMSTRONG TEASDALE LLP

BY: 

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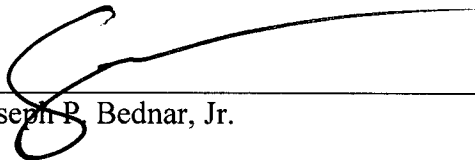
(573) 636-8457 – facsimile

ATTORNEYS FOR CITY OF RIVERSIDE

ATTORNEY VERIFICATION

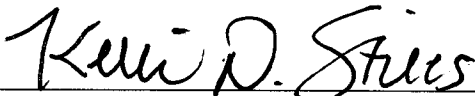
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Joseph P. Bednar, Jr., being first duly sworn, do hereby certify, depose and state that I am the attorney for the City of Riverside, Missouri, which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.



Joseph P. Bednar, Jr.

Subscribed and sworn to before me, a Notary Public, this 23rd day of April, 2008.



Notary Public for Cole County, MO
M.C.E. 01-20-2012; Commission # 08383363

CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene were sent to each of the following persons via U.S. Mail, postage paid, on this 23rd day of April, 2008.

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