BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

)

In the Matter of the Application of Missouri-American Water Company's Request for Authority to Implement General Rate Increase for Water and Sewer Service Provided in Missouri Service Areas

Case No. WR-2020-0344

APPLICATION TO INTERVENE OF <u>SUNNYDALE PROPERTIES</u>

COMES NOW Sunnydale Properties ("Sunnydale"), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and this Commission's July 2, 2020 Order Directing Notice, Consolidating Cases, Establishing Time to Intervene, and Setting a Procedural Conference, and for its Application to Intervene respectfully states as follows:

1. Sunnydale Properties is a limited liability company that manages a community of nearly 300 manufactured homes in St. Charles, Missouri. Sunnydale's interest in this case arises from its status as a high-volume customer of Missouri-American Water Company ("MAWC"). Sunnydale Properties has an interest in rates, rate design, and regulatory issues that will be at issue in this proceeding. The specific interests of Sunnydale as a customer are different from the interests of the general public.

2. On June 30, 2020, MAWC filed a proposed tariff sheets to implement a general rate increase for water and sewer service provided by MAWC.

3. Sunnydale seeks intervention because any rate increase could have a direct adverse impact on Sunnydale; the rate increase proposed in this case by MAWC could have a significant adverse impact on Sunnydale.

1

4. Sunnydale is opposed to any unreasonable or unjust increase in rates or rate classifications that would create financial hardship or undue discrimination to and among ratepayers. At this time, Sunnydale is reviewing MAWC's initial filings and is unsure any additional positions it will take in this case.

5. Sunnydale's intervention will serve the public interest in providing unique information and insights to assist the Commission in developing a complete record in order to make its determination.

6. Sunnydale's interest will not and cannot be adequately represented by any other party.

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

Stephanie S. Bell Ellinger & Associates, LLC 308 East High Street, Suite 300 Jefferson City, MO 65101 (573)750-4100 <u>sbell@ellingerlaw.com</u>

WHEREFORE, Sunnydale respectfully requests that the Commission issue its order granting Sunnydale's Application for Intervention and that Sunnydale be made a party hereto with all rights to participate in this matter. Respectfully submitted,

<u>/s/ Stephanie S. Bell</u> Stephanie S. Bell Ellinger & Associates, LLC 308 East High Street Suite 300 Jefferson City, MO 65101 (573)750-4100 <u>sbell@ellingerlaw.com</u>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on July 22, 2020.

<u>/s/ Stephanie S. Bell</u> Stephanie S. Bell