

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

In the Matter of the General	)	
Rate Increase for Water and Sewer	)	Case No. WR-2007-0216
Provided by Missouri-American Water	)	
Company	)	

**APPLICATION TO INTERVENE
OF CITY OF PARKVILLE, MISSOURI**

Comes now the CITY OF PARKVILLE, MISSOURI ("Parkville") pursuant to 4 C.S.R. 240-2.075 and applies to intervene herein and become a party hereto with respect to the above matter. In support of its late filed application, Parkville respectfully states:

1. The City of Parkville ("Parkville") is a municipality located in Platte County and the City and its residents and businesses receive water from Missouri-American Water Company (Missouri-American) through its Parkville ("Platte County") District.
2. Correspondence, communications, orders and decisions in this matter should be addressed to:

Jeremiah D. Finnegan, Esq.
FINNEGAN, CONRAD & PETERSON, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, Missouri 64111

3. It has come to Parkville's attention that on or about December 15, 2007 Missouri-American filed proposed tariff sheets to implement a general rate increase for water and sewer service designed to produce an annual \$41.7 million in gross annual water revenues

or a 24.8% increase over current water revenues. A portion of such increased revenues are to come from water customers in the Parkville District in which Parkville is located.

4. Applicant is generally opposed to an increase in water rates for itself as a customer and on behalf of residents and businesses located within its boundaries unless justified as reasonable and lawful after notice and an opportunity to be heard.

5. The granting of the proposed intervention would serve the public interest and the Applicant is a political subdivision of the State of Missouri. Applicant has been granted intervenor status in several prior Missouri-American rate cases and has been an active participant.

6. By Order dated January 3, 2007, the Commission set January 16, 2007 as the intervention deadline. Applicant realizes that this application is therefore untimely, however, there are extenuating circumstances and good cause for the delay in this filing.

7. Notice of this intervention deadline was not actually received by Applicant's Attorney until January 10th when he returned to his office after being out-of-town for several business days. Applicant's Attorney immediately contacted Applicant's Mayor advising of the pending rate case and seeking authorization to intervene. After a subsequent discussion with the Mayor advising her of the potential impact on Parkville, the Mayor advised that she believed that the City would seek to intervene, however, it was necessary for the Board of Alderman to approve the filing of an intervention. She then scheduled a presentation to the Board of Alderman at its next meeting which was held at 7:00 p.m. on February 6, 2007. At such meeting, the Board authorized the intervention.

8. Immediately after the meeting, Applicant's Attorney contacted an attorney in his firm's Jefferson City office and requested that he enter an appearance on behalf of Parkville at the early prehearing conference scheduled for the next day, February 7th. Such appearance was made and no party objected.

9. Granting the proposed intervention would serve the public interest. This application is not filed for the purposes of delay, and if the Commission should grant this application, neither the parties nor the Commission will be prejudiced since applicant agrees to take the case as it stands. At this time, there have been no hearings, other than the above-mentioned early prehearing conference, and direct testimony by Staff, Public Counsel and intervenors is not due to be filed until January 5th, 2007, according to the Proposed Procedural Schedule developed at such hearing, which should leave sufficient time for any discovery the parties may intend with respect to Parkville.

10. Applicant asserts that its intervention will be of assistance to the Commission in its deliberations on this subject, and should be accepted out of time for good cause shown, and in the interest of fairness and justice.

WHEREFORE, for the foregoing reasons, the City of Parkville respectfully requests that the Commission grant its late-filed Application to Intervene in this matter and be made a party hereto with all rights to notice of and to participate in all proceedings and hearings, to

present evidence, to cross-examine witnesses, file briefs and participate in argument if any be held; and for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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ATTORNEYS FOR CITY OF PARKVILLE,
MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 8th day of February, 2007, served the foregoing Application to Intervene by electronic delivery to all parties of record.

Jeremiah D. Finnegan,
Attorney for Intervenor
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