

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Liberty)	
Utilities (Missouri Water) LLC for a Certificate of)	
Convenience and Necessity Authorizing it to)	
Install, Own, Acquire, Construct, Operate, Control,)	Case No. SA-2021-0321
Manage, and Maintain a Sewer System in)	
Olympian Village, Jefferson County, Missouri)	

APPLICATION TO INTERVENE
OF JEFFERSON COUNTY PUBLIC SEWER DISTRICT

COMES NOW Jefferson County Public Sewer District (“District”) and, pursuant to 20 C.S.R. 4240-2.075, files its Application to Intervene, and in support thereof states as follows:

1. District is a reorganized common sewer district and political subdivision of the state of Missouri, organized pursuant to the provisions of Chapter 249 of the Revised Statutes of Missouri and reorganized pursuant to section 204.608 RSMo. (2016). District is a political subdivision of the state of Missouri pursuant to section 204.608 RSMo. (2016).

2. On June 20, 2000, the Jefferson County Commission, by Resolution and Order 6-20-2000A, determined that the construction of sanitary sewers was necessary for the sanitation, health, safety and welfare of the residents of Jefferson County, proclaimed the sewer district would be known as the “Jefferson County Public Sewer District,” and designated the description, size, and location of the District as generally encompassing the entire area of Jefferson County, except for certain incorporated cities with existing sewer systems and areas that the Missouri Department of Natural Resources had designated a sole regional or watershed supplier of wastewater disposal or treatment services, which included Olympian Village.

3. On March 29, 2021, Liberty Utilities filed its Notice of Intended Case Filing “with regard to its intended application for a Certificate of Convenience and Necessity (“CCN”)

authorizing Liberty to install, own, acquire, construct, operate, control, manage, and maintain a sewer system in Olympian Village, Jefferson County, Missouri.”

4. The District’s interest in this case is different than the interest of the general public in that the District is a continuing authority under the regulations of the Missouri Department of Natural Resources, and by Resolution and Order 6-20-2000A, it has the authority to provide sewer services in Jefferson County in the vicinity of Olympian Village. A conveyance of the sewer treatment facilities from Olympian Village to Liberty Utilities may have an impact on the District’s service to the health and public safety interests of the citizens in Jefferson County.

5. The District is not currently taking a position on the pending application, but it reserves the right to take a position once the terms of the conveyance are made public.


6. The legal name and address of the District is as follows:

Jefferson County Public Sewer District
Doug Bjornstad, District Manager
4629 Yeager Rd.
Hillsboro, MO 63050
dbjornstad@jeffcopsd.org
636-797-9900

7. Correspondence, communications, orders, and decisions in this case may be directed to the above referenced District Manager as well as the undersigned legal counsel.

WHEREFORE, for the foregoing reasons, the Jefferson County Public Sewer District respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: 
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Attorney for the Jefferson County Public
Sewer District

Dated: June 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. WA-2021-0321 via electronic transmission this 1st day of June, 2021.