BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter 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 Nos. WR-2015-0301 and SR-2015-0302

APPLICATION TO INTERVENE OF CITY OF ST. JOSEPH, MISSOURI

COMES NOW City of St. Joseph, Missouri, by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, and this Commission's August 5, 2015 *Order Suspending Tariff, Directing Notice, Setting Hearings and Directing Filings*, and respectfully applies to intervene as a party in the above referenced case. In support of this Application, St. Joseph states as follows:

1. The City of St. Joseph is a municipality organized within the State of Missouri, located in Buchanan County, Missouri, with a population of approximately 75,000. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.

2. The City of St. Joseph receives water service from Missouri-American Water Company ("MAWC").

3. Communications, correspondence, orders, and decisions in this matter should be addressed to:

Lee C. Tieman Joel S. Hane Tieman, Spencer, Holaday & Hicks, LLC 702 Felix Street St. Joseph, MO 64501 816.279.3000 816.279.3066 (fax) lee.tieman@tshhlaw.com joel.hane@tshhlaw.com 4. On July 31, 2015, MAWC submitted to the Commission proposed tariff sheets intended to implement a general rate increase for water and sewer service provided to customers in the Missouri service area of the Company. The proposed water service tariffs are designed to increase MAWC's revenues, and propose a rate increase of 10.27% for the City of St. Joseph.

5. The City of St. Joseph's interests in this proceeding is different than that of the general public and cannot be adequately represented by any other party, and it will serve the public interest if the City of St. Joseph is permitted to intervene to protect its interests.

6. The City of St. Joseph is still reviewing MAWC's direct testimony and initial pleadings, and does not have a position on MAWC's request at this time

WHEREFORE, for the foregoing reasons, the City of St. Joseph respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

TIEMAN, SPENCER, HOLADAY & HICKS, LLC

By: /s/ Lee C. Tieman Lee C. Tieman MO #39353 Joel S. Hane MO #67006 702 Felix Street St. Joseph, MO 64501 Telephone: 816.279.3000 Facsimile: 816.279.3066 <u>ATTORNEYS FOR CITY OF</u> ST. JOSEPH, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent by email this 17th day of August 2015 to all parties on the Commission's service list in this case.

/s/ Lee C. Tieman Lee C. Tieman