

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

In the Matter of the Petition of )  
Missouri-American Water Company for ) Case No. WO-2021-0343  
Approval to Establish an Infrastructure )  
System Replacement Surcharge (ISRS) )

**APPLICATION TO INTERVENE**

COMES NOW the Midwest Energy Consumers’ Group (“MECG”), pursuant to 20 CSR 4240-2.075 of the Commission’s Rules of Practice and Procedure and the Commission’s June 30, 2021 *Order Directing Notice, Setting Intervention Deadline, Directing Filing, and Suspending Tariff*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated entity representing the interests of large commercial and industrial users of electricity, water and natural gas throughout the State of Missouri including in the areas served by Missouri-American Water Company (“MAWC”).

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

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3. On June 28, 2021, MAWC filed a Petition to Establish an Infrastructure System Replacement Surcharge (ISRS) applicable to its St. Louis County, Missouri, area; and a Motion for Approval of Customer Notice. The matters to be considered in this case and the

Commission's determinations thereon, could have a direct and significant impact on cost of service to large commercial and industrial customers.

4. Granting this proposed intervention would serve the public interest and would assist the Commission in the development of a more complete record. MECG's interest is direct, immediate, unique, different from that of the general public, and will not or cannot be adequately represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that MECG be permitted to intervene in this proceeding to protect its interest.

WHEREFORE, MECG prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings, to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

WOODSMALL LAW OFFICE

/s/ David Woodsmall

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ATTORNEY FOR THE MIDWEST ENERGY  
CONSUMERS' GROUP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall  
David Woodsmall

Dated: July 7, 2021