BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water))
Company's Request for Authority to)
Implement a General Rate Increase for	Case No. WR-2010-0131
Water and Sewer Services Provided in)
Missouri Service Areas)

APPLICATION TO INTERVENE OF THE MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital and SSM HealthCare (collectively known as the "Missouri Energy Group" and hereinafter referred to as "Applicants" or "MEG"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

- 1. The MEG is an ad hoc group of not-for-profit hospital systems located within the state of Missouri that have purchased substantial amounts of water from Missouri-American Water Company ("MAWC") and have actively participated in previous cases involving MAWC and its predecessor, St. Louis County Water Company, before this Commission.
- 2. As large-use customers, the rates and terms and conditions of the water service of Applicants may be substantially and uniquely affected by the outcome of this case. MEG's interests in this matter cannot be adequately represented by any other party.
- 3. It is the position of these Applicants that revenue requirements should be determined on the basis of total cost of service and that rates for each class should be determined using an appropriate classification and allocation of those costs. Parties traditionally involved in water cases have differing views on the appropriate level of costs, the treatment of costs, their

causative factors, the cost allocation methodology to be used, and the intra-class rate design. It is only with a reasoned analysis of all parties' methods that all of the parties' interests can be adequately represented.

- 4. Granting intervention by Applicants in this case will serve the public interest by assisting the Commission in developing a more complete record for its decision; and
- 5. Correspondence or communications regarding this application, including service of all notices and orders of this Commission shall be addressed to:

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WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application to Intervene and thereby entitle said Applicants to participate fully in this proceeding.

SANDBERG PHOENIX & von GONTARD P.C.

By:

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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. <u>WR-2010-0131</u>.

Dated at St. Louis, Missouri this 24th day of November, 2009.

Lisa C. Langeneckert