

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

<b>In the Matter of the Application of Missouri-</b>	)	
<b>American Water Company for an Accounting</b>	)	
<b>Order Concerning MAWC's Lead Service</b>	)	<b>File No. WU-2017-0296</b>
<b>Line Replacement Program.</b>	)	

**APPLICATION TO INTERVENE**

COMES NOW the Midwest Energy Consumers' Group ("MECG"), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and the Commission's May 15, 2017 *Order Directing Notice*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association 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 May 12, 2017, MAWC filed its Application for an Accounting Authority Order for the cost of replacing the customers' portion of MAWC's lead service lines. 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. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in 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: May 30, 2017