

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

In the Matter of Missouri American Water)	
Company's Tariff to Revise Water and Sewer)	Case No. WR-2003-0500
Rate Schedules)	

**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, Emerson Electric Company, SSM HealthCare, and St. John's Mercy Health Care (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. Applicants own and operate not-for-profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years, Applicants have purchased substantial amounts of water from Missouri American Water Company ("MAWC") and other utility companies in the state of Missouri;
2. The rates for, and terms and conditions of, the water service of Applicants may be substantially affected by the outcome of this docket;
3. Applicants have an interest in avoiding an adverse impact on the rates for and terms and conditions of their water service;
4. 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.

5. As large customers of MAWC, Applicants' interest in this proceeding is different from that of the general public.


6. Intervention by Applicants in this case will serve the public interest by assisting the Commission in development of a more complete record for decision; and

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

Lisa C. Langeneckert, Esq.
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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 for Intervention, and thereby entitle said Applicants to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,



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Attorneys for Missouri Energy Group

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. WR-2003-0500

Dated at St. Louis, Missouri this 6th day of June , 2003

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