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Leland B. Curtis

December 13, 2000

FILED³

DEC 14 2000

Missouri Public
Service Commission

Secretary of the Commission
Missouri Public Service Commission
200 Madison, Suite 100
Jefferson City, MO 65101

RE: St. Louis County Water Company, d/b/a Missouri-American Water Company
Cause No. ~~WR~~-2001-288
WA

Dear Secretary of the Commission:

Enclosed please find an original and nine (9) copies of Application of Cities and Villages to Intervene in the above-referenced matter. Also enclosed is an additional copy to be filed-stamped and returned to me in the enclosed self-addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Leland B. Curtis by JAD

Leland B. Curtis

LBC:tm
Enclosures

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

FILED³

DEC 14 2000

Missouri Public
Service Commission

In the matter of the Application of St. Louis)
County Water Company, d/b/a Missouri-American)
Water Company, for Restatement and)
Clarification of its Certificate of Convenience)
and Necessity for St. Louis County, Missouri)

Case No.: WA-2001-288

**APPLICATION OF CITIES AND VILLAGES
TO INTERVENE**

Come now the City of Ballwin, Village of Bel-Nor, Village of Bel-Ridge, City of Bella Villa, Village of Bellerive, City of Bellefontaine Neighbors, City of Breckenridge Hills, City of Bridgeton, City of Clayton, City of Cool Valley, City of Crestwood, City of Des Peres, City of Green Park, City of Hazelwood, City of Manchester, City of Maplewood, City of Normandy, City of Pasadena Hills, City of Pine Lawn, City of Richmond Heights, Village of Riverview, City of Rock Hill, City of Town and Country, City of University City, City of Velda City and the City of Wildwood (hereinafter "The Cities and Villages"), pursuant to 4CSR 240-2.075 and for their Application to Intervene state to the Commission:

1. The City of Ballwin, Missouri is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County, Missouri. The City Hall is located at 14811 Manchester Road, Ballwin, Missouri 63011. Missouri-American Water Company ("MAWC") provides service within the City boundaries and the City receives water service from MAWC.

2. The Village of Bel-Nor, Missouri, is a village incorporated under the laws of Missouri and is located in St. Louis County. The Village Hall is located at 8416

Natural Bridge Road, Bel-Nor, Missouri 63121. MAWC provides service within the Village boundaries and the Village receives water service from MAWC.

3. The Village of Bel-Ridge, Missouri, is a village incorporated under the laws of Missouri and is located in St. Louis County. The Village Hall is located at 8842 Natural Bridge Road, Bel-Ridge, Missouri 63121. MAWC provides service within the Village boundaries and the Village receives water service from MAWC.

4. The City of Bella Villa, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County, Missouri. The City Hall is located at 3989 Bayless Avenue, Bella Villa, Missouri 63125. MAWC provides service within the City boundaries and the City receives water service from MAWC.

5. The City of Bellefontaine Neighbors, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 9641 Bellefontaine Road, Bellefontaine Neighbors, Missouri 63137. MAWC provides service within the City boundaries and the City receives water service from MAWC.

6. The Village of Bellerive, Missouri is a village incorporated under the laws of Missouri and is located in St. Louis County. The Village's mailing address is P. O. Box 5717, St. Louis, Missouri 63121. MAWC provides service within the Village boundaries and the Village receives water service from MAWC.

7. The City of Breckenridge Hills, Missouri is a third class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 9623 St. Charles Rock Road, Breckenridge Hills, Missouri 63114.

MAWC provides service within the City boundaries and the City receives water service from MAWC.

8. The City of Bridgeton, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 11955 Natural Bridge Road, Bridgeton, Missouri 63044. MAWC provides service within the City boundaries and the City receives water service from MAWC.

9. The City of Clayton, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 10 North Bemiston Avenue, Clayton, Missouri 63105. MAWC provides service within the City boundaries and the City receives water service from MAWC.

10. The City of Cool Valley, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 100 Signal Hill Drive, Cool Valley, Missouri 63121. MAWC provides service within the City boundaries and the City receives water service from MAWC.

11. The City of Crestwood, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located 1 Detjen Drive, Crestwood, Missouri 63126. MAWC provides service within the City boundaries and the City receives water service from MAWC.

12. The City of Des Peres, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 12325 Manchester Road, Des Peres, Missouri 63131. MAWC provides service within the City boundaries and the City receives water service from MAWC.

13. The City of Green Park, Missouri, is a fourth class municipality

incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 11137-A South Towne Square, Green Park, Missouri 63123. MAWC provides service within the City boundaries and the City receives water service from MAWC.

14. The City of Hazelwood, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 415 Elm Grove Lane, Hazelwood, Missouri 63042. MAWC provides service within the City boundaries and the City receives water service from MAWC.

15. The City of Manchester, Missouri is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 14318 Manchester Road, Manchester, Missouri 63011. MAWC provides service within the City boundaries and the City receives water service from MAWC.

16. The City of Maplewood, Missouri is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 7601 Manchester Avenue, Maplewood, Missouri 63143.

17. The City of Normandy, Missouri, is a third class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 7700 Natural Bridge Road, Normandy, Missouri 63121. MAWC provides service within the City boundaries and the City receives water service from MAWC.

18. The City of Pasadena Hills, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 3915 Roland Boulevard, Pasadena Hills, Missouri 63121. MAWC

provides service within the City boundaries and the City receives water service from MAWC.

19. The City of Pine Lawn, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 6250 Steve Marre Avenue, Pine Lawn, Missouri 63121. MAWC provides service within the City boundaries and the City receives water service from MAWC.

20. The City of Richmond Heights, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 1330 Big Bend Boulevard, Richmond Heights, Missouri 63117. MAWC provides service within the City boundaries and the City receives water service from MAWC.

21. The Village of Riverview, Missouri, is a village incorporated under the laws of Missouri and is located in St. Louis County. The Village Hall is located at 9699 Lilac Drive, Riverview, Missouri 63137. MAWC provides service within the Village boundaries and the Village receives water service from MAWC.

22. The City of Rock Hill, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 9620 Manchester Road, Rock Hill, Missouri 63119. MAWC provides service within the City boundaries and the City receives water service from MAWC.

23. The City of Town and Country, Missouri is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 1011 Municipal Center Drive, Town and Country, Missouri 63131.

MAWC provides service within the City boundaries and the City receives water service from MAWC.

24. The City of University City, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 6801 Delmar Boulevard, University City, Missouri 63130. MAWC provides service within the City boundaries and the City receives water service from MAWC.

25. The City of Velda City, Missouri, is a fourth class municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 2803 Maywood Avenue, Velda City, Missouri 63121. MAWC provides service within the City boundaries and the City receives water service from MAWC.

26. The City of Wildwood, Missouri, is a charter municipality incorporated under the laws of Missouri and is located in St. Louis County. The City Hall is located at 16962 Manchester Road, Wildwood, Missouri 63040. MAWC provides service within the City boundaries and the City receives water service from MAWC.

27. All communications and pleadings in this docket should be directed to:

Leland B. Curtis
Paul E. Martin
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28. On October 31, 2000, St. Louis County Water Company, doing business as Missouri-American Water Company ("Company"), filed its application for restatement and clarification of its Certificate of Convenience and Necessity for St. Louis County,

Missouri.

29. On November 14, 2000, the Missouri Public Service Commission issued its Order Directing Notice and set an intervention deadline of December 14, 2000 for any interested party to intervene.

30. On or about November 27, 2000, the Cities and Villages received notification of these proceedings from MAWC.

31. The Cities' and Villages' interests are different from those of the general public but, at this time they take no position on MAWC's Application.

WHEREFORE, the City of Ballwin, Village of Bel-Nor, Village of Bel-Ridge, City of Bella Villa, Village of Bellerive, City of Bellefontaine Neighbors, City of Breckenridge Hills, City of Bridgeton, City of Clayton, City of Cool Valley, City of Crestwood, City of Des Peres, City of Green Park, City of Hazelwood, City of Manchester, City of Maplewood, City of Normandy, City of Pasadena Hills, City of Pine Lawn, City of Richmond Heights, Village of Riverview, City of Rock Hill, City of Town and Country, City of University City, City of Velda City and the City of Wildwood request the Commission to grant their Application to Intervene.

Respectfully submitted,

CURTIS, OETTING, HEINZ
GARRETT & SOULE, P.C.

Leland B. Curtis by JMO

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Attorneys for Cities and Villages

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was mailed this 14th day of December, 2000, by placing same in the U.S. Mail postage prepaid to the following:

Leland B. Curtis by JBL
Leland B. Curtis

Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102 Dale Hardy
Roberts, Secretary Missouri Public Service Commission P. O. Box 360 Jefferson City,
MO 65102 David P. Abernathy Missouri-
American Water Company 535 North New Ballas Road St. Louis, MO 63141 Richard
T. Ciotton Brydon, Swearingen & England, P.C. 949 East Essex Ave. St. Louis, MO
63122