

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

In the Matter of Missouri-American Water)
Company for a Certificate of Convenience and)
Necessity Authorizing it to Install, Own,)
Acquire, Construct, Operate, Control, Manage,) Case No. SA-2015-0150
And Maintain a Sewer System in and around)
The City of Arnold, Missouri)

**MISSOURI DEPARTMENT OF NATURAL RESOURCES'
APPLICATION TO INTERVENE**

COMES NOW the Missouri Department of Natural Resources (“MDNR”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR’s Application to Intervene. For its Application, MDNR states as follows:

1. On December 19, 2014, Missouri-American Water Company filed an application as described in the above caption.
2. MDNR is a state agency created by § 640.010, RSMo., and charged with the duty of administering the programs assigned to MDNR relating to environmental control, including the enforcement of the Missouri Clean Water Law, §§ 644.006–644.150, RSMo.
3. The City of Arnold has approximately \$6.135 million in bonds outstanding issued in relation to MDNR’s State Revolving Funds Program, the proceeds of which were used for construction of a sewer system. Pursuant to the terms of the Purchase Agreement for the bonds, the City of Arnold is required to redeem the bonds in the event of any sale of the facilities. The City of Arnold has not notified MDNR how it intends to address its financial obligations related to the bonds.

4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that MDNR will be looking at the proposed filing from a formal policy perspective due to the outcome's potential impacts on environmental quality, in addition to its interest as the bond holder. MDNR's review will be in relation to the mandate set forth in § 640.011, RSMo, which requires MDNR, among other things, to provide "that no waste be discharged into any waters of the state without first receiving the necessary treatment or other corrective action to protect the legitimate beneficial uses of such waters and meet the requirements of the Federal Water Pollution Control Act as amended." Intervention is necessary in order for MDNR to fulfill its statutory mandate and to represent its interest as it relates to certain outstanding debt on the sewer system.

5. At this time MDNR is unsure whether it will support the relief sought by Missouri-American Water Company.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing has been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 21st day of January, 2015.

/s/ Timothy A. Blackwell
TIMOTHY A. BLACKWELL