

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

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In the Matter of the Application of  
TUK LLC for Certificates of  
Convenience and Necessity  
Authorizing it to Install, Own,  
Acquire, Construct, Operate, Control,  
Manage and Maintain Water and  
Sewer Systems in Jefferson County,  
Missouri

Case No. WA-2015-0169

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

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

1. On January 20 and 21, 2015, TUK LLC (Company) filed two applications with the Missouri Public Service Commission (Commission), requesting the Commission grant it certificates of convenience and necessity to install, own acquire, construct operate, control, manage, and maintain water and sewer systems in Jefferson County, Missouri. Those applications were numbered WA-2015-0169 and SA-2015-0171, and upon the Company's motion, the Commission consolidated both applications into WA-2015-0169. On January 21, 2015 the Commission issued its Order Directing Notice and

Setting Date for Submission of Intervention Requests. In that order, the Commission set the intervention deadline on February 11, 2015.

2. MDNR is a state agency created by 640.010, RSMo., and is 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. MDNR has an interest different than that of the general public, yet its intervention will serve a public interest. MDNR will consider the proposed filing from a formal policy perspective due to its possible potential impacts on environmental quality. MDNR’s review is necessitated by its mandate set forth in § 644.011, RSMo, requiring MDNR ensure “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.”

4. Applicant’s facilities have been subject to ongoing investigation by MDNR. At this time, MDNR has not determined whether it supports TUK LLC’s PSC application.

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

Respectfully submitted,

**CHRIS KOSTER**  
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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 11<sup>th</sup> day of February, 2015.

/s/ Timothy A. Blackwell  
TIMOTHY A. BLACKWELL

/s/ Elliott J. Usher  
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