

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

In the Matter of Missouri-American Water)
Company's Request for Authority to)
Implement a General Rate Increase for) File No. WR-2015-0301
Water and Sewer Service Provided in)
Missouri Service Areas)

APPLICATION TO INTERVENE OF CITY OF JOPLIN, MISSOURI

COMES NOW the City of Joplin, by and through counsel, pursuant to 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case, and in support of its Application to Intervene states as follows:

1. The City of Joplin (Joplin) is a municipality located in Jasper County, Missouri. The Missouri-American Water Company (MAWC) operates within the City of Joplin under a franchise granted by the City, and various parts of its plant occupy City right-of-way. The City has a police power interest in MAWC's exercise of its franchise that is different from the interest of the general public. In addition, the City also has an interest in the welfare of its citizens, who receive their water service from MAWC, that is different from the interest of the general public.

2. The Missouri Public Service Commission has previously recognized Joplin's interest in proceedings affecting the rates for water service in the MAWC Joplin District in permitting Joplin's intervention in prior MAWC rate-related proceedings, including File No. WR-2010-0131 and File No. WR-2011-0337.

3. On July 31, 2015, MAWC filed proposed tariffs reflecting an annual revenue increase of approximately \$51.0 million, and these proposed tariffs will impact Joplin ratepayers.

4. On August 5, 2015, the Missouri Public Service Commission issued an Order suspending the proposed rates and tariffs and directing an investigation, setting an intervention deadline, scheduling a hearing, and setting a pre-hearing conference. This Application to Intervene is timely under that Order.

5. Joplin states, pursuant to 4 CSR 240-2.075(2), that it is opposed to any unreasonable or unjust increase in water rates or an increase in rates that would create financial hardship or undue discrimination to its citizens and businesses, and to the City of Joplin itself.

6. The granting of the proposed intervention would serve the public interest.

7. Correspondence, communications, orders and decisions in this matter should be addressed to:

Marc H. Ellinger
Stephanie S. Bell
Blitz, Bardgett & Deutsch, L.C.
308 East High Street, Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358

WHEREFORE, for the foregoing reasons, the Intervenor City of Joplin respectfully requests that the Commission grant this Application to Intervene in this matter.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By: /s/ Marc H. Ellinger
Marc H. Ellinger, #40828
Stephanie S. Bell, #61855
308 East High Street, Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358
E-mail: mellinger@bbdlc.com
E-mail: sbell@bbdlc.com

CERTIFICATE OF SERVICE

I hereby certify that true copies of the above Application to Intervene were sent to each of the following parties of record via electronic transmission this 18th day of August, 2015:

Kevin Thompson
E-mail: Kevin.Thompson@psc.mo.gov

Office of General Counsel
E-mail: staffcounsel@psc.mo.gov

Office of the Public Counsel
E-mail: opcservice@ded.mo.gov

Dean L. Cooper
E-mail: dcooper@brydonlaw.com

Timothy W. Luft
E-mail: Timothy.Luft@amwater.com

/s/ Marc H. Ellinger
Marc H. Ellinger