

**BEFORE THE MISSOURI 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)	Case. Nos.	WR-2015-0301
Increase for Water and Sewer)	and	SR-2015-0302
Service Provided in)		
Missouri Service Areas)		

APPLICATION TO INTERVENE OF CITY OF RIVERSIDE MISSOURI

COMES NOW, the City of Riverside Missouri ("Riverside"), a fourth class city, by and through undersigned counsel and pursuant to 4 C.S.R. 240-2.075, and this Commission's August 5, 2015 *Order Suspending Tariff, Directing Notice, Setting Hearings and Directing Filings*, and respectfully applies to intervene as a party in the above referenced case. In support of this Application, Riverside offers the following suggestions in support thereof:

1. Riverside is a fourth class city located in the county of Platte, State of Missouri, and as such is a customer within the Platte County service area of Missouri-American Water Company ("MAWC"), as are the citizens and businesses of Riverside whose health safety and welfare interests it would also represent in this case. The City has a police power interest in MAWC's exercise of its duties and obligations 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 Riverside's interest in proceedings affecting the rates for water service in the MAWC Platte County District in permitting Riverside'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 Riverside 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. The granting of the proposed intervention would serve the public interest.

6. The City of Riverside's interests in this proceeding is different than that of the general public and cannot be adequately represented by any other party, and it will serve the public interest if the City of Riverside is permitted to intervene to protect its interests.

7. The City of Riverside is still reviewing MAWC's direct testimony and initial pleadings, and does not have a position on MAWC's request at this time.

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

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WHEREFORE, for the foregoing reasons, the Intervenor City of Riverside respectfully requests that the Commission grant this Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-

examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

SPENCER FANE BRITT & Browne LLP

BY: _____


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ATTORNEY FOR CITY OF RIVERSIDE

ATTORNEY VERIFICATION

COUNTY OF COLE)
) ss.
STATE OF MISSOURI)

I, Joseph P. Bednar, Jr., being first duly sworn, do hereby certify, depose and state that I am the attorney for the City of Riverside, Missouri, which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.




Joseph P. Bednar, Jr.

Subscribed and sworn to before me, a Notary Public, this 24th day of August, 2015.



KELLI D. STILES
My Commission Expires
January 20, 2016
Cole County
Commission #12383363



Notary Public for Cole County, MO
M.C.E. 01-20-2016; Commission #12383363

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served via the PSC's electronic filing system (EFIS), on this 24th day of August, 2015, upon all individuals, parties and intervenors and/or their counsel who have entered their appearances in this case on EFIS, and specifically upon the following:

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