

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

In the Matter of the Petition of)	
Missouri-American Water Company for)	
Approval to Change its Infrastructure)	Case No. WO-2011-0106
System Replacement Surcharge (ISRS))	

**MOTION TO FILE APPLICATION OF UWUA LOCAL 335
TO INTERVENE OUT OF TIME**

COMES NOW UWUA Local 335 (“Local 335”), by counsel, and respectfully moves this Commission for permission to file its application to intervene in this proceeding out of time. In support of this application, Local 335 states:

1. By order dated December 22, 2010 (“Order”), the Commission set January 14, 2011 as the deadline for filing notice of intervention in this matter.
2. Due to the holidays and other pending matters, Local 335’s counsel did not become aware of the deadline to intervene until after it had passed.
3. Local 335’s late filing will not prevent it from meeting the other deadlines in this matter.

WHEREFORE, UWUA Local 335 respectfully requests the Commission for permission to file out of time its application for intervention, which is being submitted contemporaneously.

Respectfully submitted,

/s/ Michael A. Evans
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on February 4, 2011, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Michael A. Evans