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

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In the Matter of Missouri-American Water ) Company's Request for Authority Implement General Rate Increase for Water ) Docket No. WR-2017-0285 and Sewer Service Provided in Missouri ) Service Areas.

## **Application to Intervene**

COMES NOW, Triumph Foods, LLC (Triumph Foods), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, applies to intervene and become a party to this proceeding. In support of its Application, Triumph Foods states:

1. Triumph Foods is a Missouri limited liability company with its principal place of business located at 5302 Stockyards Expressway, St. Joseph, Missouri.

2. Triumph Foods owns and operates a large pork-processing facility in St. Joseph, Missouri and is the largest industrial consumer of water in Missouri American Water Company's (MAWC) service territory. It employs 2,700 people with 2,300 of those in production-related positions and 400 holding management and clerical positions.

2. Triumph Foods receives water service from MAWC under a special service agreement pursuant to MAWC's economic development rider. The tariff, the contract, and its amendments have been approved by the Commission in previous MAWC rate cases.

3. Triumph Foods must be able to represent its own interests regarding the special service agreement and the issues in this proceeding that affect it. Because Triumph Foods' interest in this proceeding is different than the general public and cannot be adequately represented by any other party, it will aid the Commission and serve the public interest if Triumph Foods is permitted to intervene to protect its interests.

4. Correspondence or communications regarding this Application, including service of all notices and orders of this Commission should be addressed to:

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5. Triumph Foods is still reviewing MAWC's direct testimony and initial pleadings,

and does not have a position on MAWC's request at this time.

WHEREFORE, Triumph Foods, LLC requests that it be permitted to intervene in this proceeding.

/s/ Joshua HardenJoshua HardenMBN 57941Aimee DavenportMBN 50989Stinson Leonard Street LLP1201 Walnut St., Suite 2900Kansas City, Missouri 64106Telephone: 816-691-3249E-mail: joshua.harden@stinson.comE-mail: aimee.davenport@stinson.com

Attorneys for Triumph Foods, LLC

## **<u>Certificate of Service</u>**

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 13th of July, 2017 to the persons on the Commission's service list in this case.

<u>/s/ Joshua Harden</u> Attorney for Triumph Foods, LLC