## 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 Nos. WR-2015-0301 |
| Water and Sewer Service Provided in      | ) | and SR-2015-0302       |
| Missouri Service Areas                   | ) |                        |

## APPLICATION TO INTERVENE

COME NOW Public Water Supply District Nos. 1 and 2 of Andrew County ("Water District Intervenors") and, pursuant to 4 CSR 240-2.075 and the Commission's *Order Suspending Tariff, Directing Notice, Setting Hearings and Directing Filings* ("Order") entered in this matter on August 5, 2015, make their Application to Intervene in the above-referenced matter and respectfully state as follows:

1. The Water District Intervenors are each a political subdivision of the State of Missouri organized and existing pursuant to Chapter 247, RSMo, and their legal names and contact information follow:

Public Water Supply District No. 1 of Andrew County 201 S. 71 Highway Savannah, Missouri 64485 Telephone: (816) 324-6266

Public Water Supply District No. 2 of Andrew County 668 Main Street, Box 210 Cosby, Missouri 64436 Telephone: (816) 378-3395

2. All correspondence, communications, orders and decisions of the Commission should be sent to:

James M. Fischer
Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, Missouri 65101
(573) 636-6758
(573) 636-0383 (Fax)
jfischerpc@aol.com
lwdority@sprintmail.com

- 3. The Water District Intervenors do not have any pending actions or final unsatisfied judgments or decisions against them as contemplated by 4 CSR 240-2.060(1)(K), nor do the Water District Intervenors have any annual reports or assessment fees that are overdue.
- 4. The Water District Intervenors are customers of Missouri-American Water Company ("Missouri-American" or "water company") and purchase water from said water company for distribution and resale to their own customers.
- 5. As resale customers of Missouri-American, the interests of the Water District Intervenors are different from that of the general public. Accordingly, the Water District Intervenors have an interest in this proceeding which is different from that of the general public and which may be adversely affected by a final order arising from this case. Furthermore, the Water District Intervenors' expertise in this area will assist the Commission in resolving this matter and their intervention will serve the public interest.
- 6. No other party to this proceeding can adequately represent the Water District Intervenors' interests. The Commission has previously recognized the Water District Intervenors' interests in proceedings affecting the rates for water service in permitting their intervention in prior Missouri-American rate-related proceedings, most recently in File No. WR-2011-0337.

7. The Water District Intervenors are still reviewing information submitted by Missouri-American regarding the various issues in this case, and have not determined their positions at this time.

**WHEREFORE**, Applicants Public Water Supply District Nos. 1 and 2 of Andrew County request that this Commission enter its Order granting their Application to Intervene.

Respectfully submitted,

## /s/ Larry W. Dority

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Attorneys for Public Water Supply District Nos. 1 and 2 of Andrew County

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been e-mailed on this 24th day of August, 2015, to the persons on the Commission's service list in this case.

| /s/ Larry W. Dority |  |
|---------------------|--|
| Larry W. Dority     |  |