

**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-2011-0337**  
Water Service Provided in Missouri )  
Service Areas. )

**APPLICATION TO INTERVENE**

COME NOW Public Water Supply District Nos. 1 and 2 of Andrew County, and ("Water District Intervenors") and City of Brunswick, Missouri, ("Brunswick") and, pursuant to 4 CSR 240-2.075 and the Commission's Order Directing Notice, Setting Intervention Deadline, Setting Hearings, Directing Filings, and Setting Procedural Schedule, ("Order") entered in this matter on July 5, 2011, 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. Brunswick is a municipality located in Chariton County, Missouri. The contact information for Brunswick is as follows:

Mayor Joe Moser  
City of Brunswick  
Brunswick, Missouri 65236  
Telephone: 660-548-3048

3. 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](mailto:jfischerpc@aol.com)  
[lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)

4. The Water District Intervenors and Brunswick 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 and Brunswick have any annual reports or assessment fees that are overdue.

5. The Water District Intervenors and Brunswick 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.

6. The interests of the Water District Intervenors and Brunswick are different from that of the general public. Accordingly, the Water District Intervenors and Brunswick 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' and Brunswick's expertise in this area will

assist the Commission in resolving this matter and their intervention will serve the public interest.

7. No other party to this proceeding can adequately represent the Water District Intervenors' or Brunswick's interests.

8. The Water District Intervenors and Brunswick 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, and the City of Brunswick, Missouri request that this Commission enter its Order granting this Application to Intervene.

Respectfully submitted,

**/s/ Larry W. Dority**

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Fax: (573) 636-0383

Attorneys for Public Water Supply District  
Nos. 1 and 2 of Andrew County and City of  
Brunswick, Missouri

**VERIFICATION**

County of Cole            )  
                                      )  
State of Missouri        )            ss.

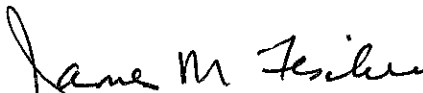
COMES NOW Larry W. Dority and upon his oath states that he is a licensed attorney in good standing in Missouri, that he is familiar with the matters set forth in this application to intervene, and that the matters alleged are true and correct to the best of his knowledge, information and belief. Mr. Dority further states that he has been authorized to sign and file this verification on behalf of Public Water Supply District Nos. 1 and 2 of Andrew County, and the City of Brunswick, Missouri.

  
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LARRY W. DORITY

Subscribed and sworn to before me this 19<sup>th</sup> day of July, 2011.



JAMES M. FISCHER  
My Commission Expires  
October 6, 2011  
Cole County  
Commission #07385346

  
\_\_\_\_\_  
Notary Public

My Commission Expires: October 6, 2011

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, e-mailed or mailed, postage prepaid, this 19th day of July, 2011, to counsel of record for each party in accordance with the service list maintained in this proceeding by the Secretary of the Commission on EFIS.

/s/ **Larry W. Dority**

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Larry W. Dority