

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Missouri-American Water)
Company's Request for Authority to Implement) File No. WR-2022-0303
a General Rate Increase for Water and Sewer) File No. SR-2022-0304
Service Provided in Missouri Service Areas)

**APPLICATION TO INTERVENE OUT OF TIME OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and submits its Application to Intervene Out of Time in this proceeding pursuant to 20 CSR 4240-2.075 (10). In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Missouri-American Water Company.

2. All communications and pleadings in this case should be directed to:

Diana Plescia
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
dplescia@chgolaw.com

3. As a representative of the interests of large industrial customers of Missouri-American Water Company, the MIEC's interest is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

4. Good cause exists to grant the MIEC's application, which was delayed due to the need for client consultation. This case is at an early stage, and no party will be prejudiced if this

application is granted. The MIEC accepts the record as it stands, including the requirements of the Commission's orders in this case.

5. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Application to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

Diana M. Plescia #42419

130 S. Bemiston, Suite 200

St. Louis, Missouri 63105

Telephone: (314) 725-8788

Facsimile: (314) 725-8789

[E-mail: dplescia@chgolaw.com](mailto:dplescia@chgolaw.com)

Attorney for the Missouri

Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 27th day of July, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia