

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

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

**APPLICATION TO INTERVENE FOR CITY OF RIVERSIDE, MISSOURI**

COMES NOW, the City of Riverside, Missouri ("Riverside"), a fourth class city, by and through undersigned counsel and pursuant to 4 C.S.R. 240-2.075 of the Rules of Practice and Procedure, and respectfully applies to intervene as a party in the above-referenced case. In support of this application, Riverside offers the following suggestions in support thereof:

1. Riverside is a fourth class city located in the County of Platte, State of Missouri, and whose City Hall is located at 2950 NW Vivion Road, Riverside, MO 64150, and as such is a customer within the Platte County service area of Missouri-American Water Company ("MAWC"), as are the citizens and businesses of Riverside whose health, safety and welfare interests it would also represent in this case.

2. The City has a police power interest in MAWC's exercise of its duties and obligations that is different from the interest of the general public.

3. In addition, the City also has an interest in the welfare of its citizens, who receive their water service from MAWC, which is different from the interest of the general public.

4. The Missouri Public Service Commission has previously recognized Riverside's interest in proceedings affecting the rates for water service in the MAWC Platte County District in permitting Riverside's intervention in prior MAWC rate-related proceedings, including but not limited to File No. WR-2010-0131, File No. WR-2011-0337, File No. WR-2015-0301 and File WR-2020-0344.

5. All communications, correspondence, orders, decisions and pleadings in this docket should be directed to:

Joseph P. Bednar, Jr.  
Spencer Fane LLP  
304 East High Street  
Jefferson City, MO 65101  
Telephone: (573) 634-8116  
Facsimile: (573) 634-8140  
[jbednar@spencerfane.com](mailto:jbednar@spencerfane.com)

6. This case arose when MAWC submitted a tariff designed to implement a general rate increase for its water and sewer service.

7. On July 6, 2022, the Commission issued an Order Directing Notice and Establishing Time to Apply to Intervene directing that interested parties wishing to intervene shall file an application no later than July 26, 2022.

8. This application is therefore timely.

9. Riverside seeks to intervene in this rate case proceeding.

10. Riverside is interested in the impact of any decisions in this proceeding on behalf of itself and its residents and businesses.

11. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

12. At this time, Riverside is reviewing MAWC's direct testimony and initial pleadings, and is uncertain of the position it will take in this matter.

13. The granting of the proposed intervention would serve the public interest.

14. Riverside's interests are different from those of the general public and cannot be adequately represented by any other party, and it will serve the public interest if Riverside is permitted to intervene to protect its interests.

WHEREFORE, for the foregoing reasons, Riverside, Missouri, respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

/s/ Joseph P. Bednar, Jr.

Joseph P. Bednar, Jr. #33921  
SPENCER FANE LLP  
304 East High Street  
Jefferson City, MO 65101  
Telephone: (573) 634-8116  
Facsimile: (573) 634-8140  
[jbednar@spencerfane.com](mailto:jbednar@spencerfane.com)

**ATTORNEY FOR CITY OF RIVERSIDE**

**Certificate of Service**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served via the Public Service Commission's (PSC's) electronic filing system (EFIS), on this 25<sup>th</sup> day of July, 2022, upon all individuals, parties and intervenors and/or their counsel who have entered their appearances in this case on EFIS, and specifically upon the following:

[karen.bretz@psc.mo.gov](mailto:karen.bretz@psc.mo.gov)  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov);  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)  
[Lindsay.VanGerpen@opc.mo.gov](mailto:Lindsay.VanGerpen@opc.mo.gov)  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com);  
[Timothy.Luft@amwater.com](mailto:Timothy.Luft@amwater.com);  
[Rachel.Niemeier@amwater.com](mailto:Rachel.Niemeier@amwater.com)  
[tim.opitz@opitzlawfirm.com](mailto:tim.opitz@opitzlawfirm.com)  
[wds@wdspsc.com](mailto:wds@wdspsc.com)  
[Diana.Carter@LibertyUtilities.com](mailto:Diana.Carter@LibertyUtilities.com)  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)

/s/ Joseph P. Bednar, Jr.

**ATTORNEY VERIFICATION**

STATE OF MISSOURI    )  
  ) ss.  
COUNTY OF COLE        )

I, Joseph P. Bednar, Jr., being first duly sworn, do hereby certify, depose and state that I am the attorney for the City of Riverside, Missouri, which seeks intervention in the above-referenced proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

/s/ Joseph P. Bednar, Jr.  
Joseph P. Bednar, Jr.

Subscribed and sworn to before me, a Notary Public, this 25<sup>th</sup> day of July, 2022.

/s/ Kelli D. Stiles  
Notary Public for Cole County, MO  
M.C.E. 1-20-2024; Commission # 12383363