

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

In re: The Matter of the General Rate Increase)
for Water and Sewer Service Provided by)
Missouri-American Water Company) Case No. WR-2003-0500

**APPLICATION OF
ST. JOSEPH WATER RATE COALITION TO INTERVENE**

The St. Joseph Water Rate Coalition, by and through its counsel, and pursuant to 4 CSR 240-2.075, applies to intervene in the above-entitled matter. In support of its Application, the St. Joseph Water Rate Coalition states:

1. The St. Joseph Water Rate Coalition is an ad hoc group of industrial, commercial, and governmental users who take water service from the Missouri-American Water Company ("MAWC") in its St. Joseph District which encompasses a service territory in and around the City of St. Joseph, Missouri.¹

2. Communications in this matter should be addressed to:

Karl Zobrist
Teresa Brown
Blackwell Sanders Peper Martin, LLP
2300 Main Street, Suite 1000
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(816) 983-8000
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tbrown@blackwellsanders.com

3. On May 19, 2003, MAWC filed for a general rate increase for water and sewer services with the Missouri Public Service Commission.

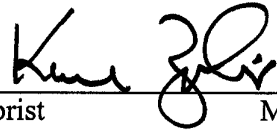
¹ Participants in the St. Joseph Water Rate Coalition are: the City of St. Joseph, Buchanan County, St. Joseph School District, St. Joseph Area Chamber of Commerce, Heartland Health, Sara Lee, Hillyard Companies, Phoenix Scientific, Inc., Prime Tanning Corp., Johnson Controls, Ag Processing, Inc., and Artesian Ice and Cold Storage.

4. The St. Joseph Water Coalition requests leave to intervene in the above-entitled matter.

5. Because the general rate increase proposed by Missouri American Water Company will uniquely impact the members of the St. Joseph Water Coalition, its interests in this proceeding are different than that of the general public and cannot be adequately represented by any other party.

6. The St. Joseph Water Coalition's participation in this matter will not delay or hinder these proceedings.

WHEREFORE, the St. Joseph Water Coalition respectfully requests permission to intervene in the above-entitled matter.



Karl Zobrist

MO #28325

Teresa Brown

MO #49424

Blackwell Sanders Peper Martin LLP

2300 Main Street, Suite 1100

Kansas City, Missouri 64108

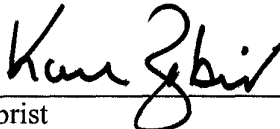
(816) 983-8000

(816) 983-8080 (FAX)

VERIFICATION

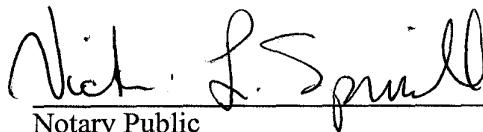
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Karl Zobrist, of lawful age, being first duly sworn on oath, states that he is an attorney for the St. Joseph Water Rate Coalition; that he has read the above and foregoing Application, and knows the contents thereof; and that the statements contained therein are true and correct.



Karl Zobrist

Subscribed and sworn to before me this 17th day of June, 2003.



Notary Public

My Commission Expires:

VICKI L. SPRUILL
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County
My Commission Expires: January 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid,
this 17th day of June, 2003 to:

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