

In the Matter of the Application of )  
Timber Creek Sewer Company for a ) **File No. SA-2010-0063**  
Certificate of Convenience and Necessity )

COMES NOW the Platte County Regional Sewer District (“PCRSd” or “District”), a political subdivision, pursuant to Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.075 and the Commission’s *Notice of Application, and Order Setting Deadline for Intervention and Directing Staff to File Recommendation* issued in this matter on August 24, 2009, and respectfully applies to intervene in the above-captioned proceeding. In support of its application, PCRSd respectfully states:

1. The Platte County Regional Sewer District is a common sewer district organized and existing pursuant to the provisions of Chapter 204, RSMo. The District was incorporated by the Circuit Court of Platte County, Missouri by its Order of April 15, 1992.

2. PCRSD was organized, incorporated and specifically authorized to provide sanitary sewer collection and treatment services to the entire unincorporated area of Platte County, Missouri.

3. The contact information for PCRSD is:

Platte County Regional Sewer District  
414 State Route 273  
Tracy, MO 64079  
Telephone: 816-858-2052  
Facsimile: 816-858-3537  
Email: [CReineke@pcrsd.com](mailto:CReineke@pcrsd.com)

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

James M. Fischer MBN 27543  
Larry W. Dority MBN 25617  
FISCHER & DORITY, P.C.  
101 Madison, Suite 400  
Jefferson City, Missouri 65101  
(573) 636-6758  
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and

Robert H. Shaw MBN 29007  
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303 Marshall Road  
P.O. Box 168  
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Tel.: 816-858-2630  
Fax: 816-431-5086  
Email: [rhshaw@mcginness-shaw.com](mailto:rhshaw@mcginness-shaw.com)

5. PCRSD does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K), nor does PCRSD have any annual reports or assessment fees that are overdue.

6. On August 24, 2009, Timber Creek filed an Application with the Missouri Public Service Commission to further extend its authorized service area for providing sanitary sewer service in Platte County, Missouri into certain unincorporated areas of Platte County, Missouri.

7. The area designated by Timber Creek in its Application is presently under the jurisdiction of the Platte County Regional Sewer District and the District opposes any further extension of the service area of Timber Creek into the Platte County Regional Sewer District's jurisdictional area. Accordingly, PCRSD opposes the relief sought in Timber Creek's Application.

8. As shown above, PCRSD has 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, PCRSD's expertise in this area will assist the Commission in resolving this matter and its intervention will serve the public interest.

9. No other party to this proceeding can adequately represent PCRSD's interests.

**WHEREFORE**, the Platte County Regional Sewer District respectfully requests the Commission to grant its application to intervene as a party in this matter.

Respectfully submitted,

**/s/ Larry W. Dority**

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and


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ATTORNEYS FOR THE PLATTE COUNTY  
REGIONAL SEWER DISTRICT

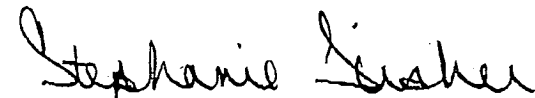
VERIFICATION

County of Platte       )  
                              )  
State of Missouri     )       ss.

COMES NOW Robert H. Shaw 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. Shaw further states that he has been authorized to sign and file this verification on behalf of Platte County Regional Sewer District.

  
\_\_\_\_\_  
ROBERT H. SHAW

Subscribed and sworn to before me this 21<sup>st</sup> day of September, 2009.

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

My Commission Expires: \_\_\_\_\_  
Stephanie Fisher  
~~Notary Public~~ Notary Seal  
State of Missouri  
Platte County  
My Commission Expires March 28, 2013  
Commission # 09479741

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of September, 2009, a copy of the foregoing was served by email to the following:

General Counsel Office  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[GenCounsel@psc.mo.gov](mailto:GenCounsel@psc.mo.gov)

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/s/ Larry W. Dority

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Larry W. Dority