

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

In the Matter of the Application of Ridge	)	
Creek Water Company, LLC for a	)	
Certificate of Convenience and Necessity	)	Case No. WA-2015-0182
authorizing it to construct, install, own,	)	
operate, control, manage, and maintain	)	
a water system for the public located in	)	
an unincorporated area in Pulaski County,	)	
Missouri	)	

**MISSOURI DEPARTMENT OF NATURAL RESOURCES’  
APPLICATION TO INTERVENE**

The Missouri Department of Natural Resources (“Department”) by and through its undersigned counsel, the Missouri Attorney General’s Office, and pursuant to the Public Service Commission Regulation 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting the Department’s Application to Intervene in the above named matter. In support of its Application, the Department states as follows:

1. On February 4, 2015, Ridge Creek Water Company, LLC (hereinafter “Ridge Creek”) filed its Application to obtain a Certificate of Convenience and Necessity to “extend, install, own, acquire, construct, operate, control, manage and maintain a water system for the public in a platted subdivision located in an unincorporated area in Pulaski County, Missouri...” Ridge Creek Application, p 2, ¶4.

2. Pursuant to 4 CSR 240-2.075(1), motions to intervene are due on or before March 6, 2015. This Motion is therefore timely filed.

3. The Department is a state agency created under § 640.010 RSMo, to administer the programs relating to environmental control and conservation and to manage the natural resources of the state of Missouri. Specifically, the Department's Water Protection Program oversees the Missouri Safe Drinking Water Act ("SDWA") §§ 640.100 – 640.140 RSMo.

4. Because the Department is tasked with protecting public health and the environment, the Department's interest is different than that of the general public. The Department's review and participation in this matter is intended to ensure that the drinking water system installed by Ridge Creek can be and is operated in a manner compliant with SDWA. Ridge Creek installed an unpermitted public water system that may not be in compliance with Missouri law and safe drinking water regulations. The Department has been working with Ridge Creek to bring it into compliance, but as of the date of this filing, Ridge Creek remains out of compliance. The people served by the system may therefore be without safe water to drink.

5. For the foregoing reasons, the Department opposes Ridge Creek's application unless Ridge Creek becomes compliant with the Missouri Safe Drinking Water Act.

6. Communications, correspondence, orders and decision in this matter should be addressed to:

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WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

**CHRIS KOSTER**  
Attorney General

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**Attorney for Missouri Department of  
Natural Resources**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 24<sup>th</sup> day of February, 2015:

/s/ Thais Ann Folta  
Thais Ann Folta  
Attorney for Intervenor Applicant