

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

In the Matter of an Investigation into the Operations)	
And Condition of Tri-States Utility, Inc.)	<u>Case No. WO-2013-0403</u>
)	
)	

**APPLICATION TO INTERVENE/PARTICIPATE AS AN INTERESTED ENTITY BY
MISSOURI-AMERICAN WATER COMPANY**

Comes Now Missouri-American Water Company ("MAWC" or "Applicant"), pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and hereby applies to intervene (or, in the alternative, participate) in the above-referenced proceeding involving Tri-States Utility, Inc. ("Tri-States") as an interested entity. In support of this Application, Applicant respectfully states as follows:

1. MAWC is a Missouri corporation with its principal office and place of business at 727 Craig Road, St. Louis, Missouri 63141. MAWC is a Missouri corporation in good standing. A certified copy of MAWC's certificate of good standing was submitted in Case No. SA-2007-0316 and is incorporated by reference. MAWC currently provides water service to the public in and around the cities of St. Joseph, Joplin, Brunswick, Mexico, Warrensburg, Parkville, Riverside, Jefferson City, and parts of St. Charles, Warren, Jefferson, Morgan, Pettis, Benton, Barry, Stone, Greene, Taney, Christian and Platte Counties, and most all of St. Louis County, Missouri. MAWC currently provides water service to approximately 454,000 customers. MAWC provides sewer service to approximately 3,200 customers in Callaway, Jefferson, Pettis, Cole, Morgan, Platte, and Warren Counties, Missouri. MAWC is a "water corporation," a "sewer corporation" and a "public utility" as those terms are defined in Section 386.020 RSMo. 2000, and is subject to the jurisdiction and supervision of the Commission as provided by law. MAWC has no annual report or assessment fees that are overdue.

2. MAWC's intervention or participation in this matter as an interested entity would serve the public interest. MAWC has been in prior discussions to acquire Tri-States' assets. MAWC has other water facilities in the area. MAWC may be in a position to provide information that will assist the Staff and Office of the Public Counsel with their investigation and to provide potential solutions for any issues related to Tri-States' operations. Therefore, granting this proposed intervention would serve the public interest and assist the Commission in development of a more complete record.

3. While Applicant does not at this time have sufficient information to assert a position on this case, it reserves the right to assert positions after it has had an adequate opportunity to examine the record, and any documents of other parties have filed herein.

4. Communications in regard to this Application should be addressed to:

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WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicant in these proceedings, Applicant asks that the Commission grant this Application for Intervention/participation, and hereby entitle said Applicant to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made a party to this proceeding.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

By: /s/ Timothy W. Luft
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed electronically and served via electronic mail or by U.S. Mail, postage prepaid, on March 18, 2013, to:

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/s/ Timothy W. Luft