CURTIS, OETTING, HEINZ, GARRETT & SOULE, P. C. ATTORNEYS AT LAW

(30 SOUTH BEMISTON, SUITE 200 ST. LOUIS, MISSOURI 63105 (314) 725-8788 FACSIMILE (314) 725-8789

www.curtisoetting.com

November 15, 1999

FILED

NOV 1 6 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, MO 65101

Missouri Public Service Commission

RE:

LELAND B. CURTIS

Missouri-American Water Company

Cause No. WR-2000-281 and SR-2000-282

Dear Mr. Roberts:

Enclosed for filing is one original and fifteen copies of the Application to Intervene for Cities of Warrensburg, O'Fallon and Weldon Spring.

Please stamp "filed" on the extra copy and return the copy to me in the enclosed self-addressed stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Leland B. Curtis

LBC:tm Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION

FILED
NOV 1 6 1999

OF THE STATE OF MISSOURI

Missouri Public Service Commission

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) Case No.: WR-2000-281
) Tariff No.: 200000366
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) Case No.: SR-2000-282
) Tariff No.: 200000367
)

APPLICATION TO INTERVENE FOR CITIES OF WARRENSBURG, O'FALLON AND WELDON SPRING

Come now the Cities of Warrensburg, O'Fallon and Weldon Spring, pursuant to 4CSR 240-2.060 and for its Application to Intervene states to the Commission:

- 1. The City of Warrensburg, Missouri, is a third class municipality situated in Johnson County, Missouri. The City Hall is located at 102 S. Holden, Warrensburg, Missouri 64093. The City receives water service from Missouri-American Water Company ("MAWC").
- 2. The City of O'Fallon, Missouri, is a fourth class municipality situated in St. Charles County, Missouri. The City Hall is located at 100 North Main Street, O'Fallon, Missouri 63366. The City receives water from MAWC.
- 3. The City of Weldon Spring, Missouri, is a fourth class municipality situated in St. Charles County, Missouri. The City Hall is located at 711 Nancy Lane, Weldon Spring, Missouri 63304. The City receives water from MAWC.

4. All communications and pleadings in this docket should be directed to:

Leland B. Curtis 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 726-8789 (Fax)

- 5. On October 15, 1999, Missouri-American Water Company submitted to the Commission proposed tariff sheets intended to implement a general rate increase for water and sewer service provided to customers in the Missouri service area of the Company. The proposed tariffs bear a requested effective date of November 15, 1999. The proposed water service tariffs are designed to produce an annual increase of approximately 53.97 percent (\$16,446,277) in the Company's revenues. The proposed sewer service tariffs are designed to produce an annual increase of approximately 5.0 percent \$2,363) in the Company's revenues.
- 6. On October 28, 1999, the Commission issued its Suspension Order and Notice setting a date for interested parties to intervene no later than November 17, 1999.
- 7. The Cities of Warrensburg, O'Fallon and Weldon Spring seek to intervene in this rate case proceeding because MAWC proposed to allocate its general rate increase on a Single Tariff Pricing ("STP") basis. The Cities oppose the STP methodology and support District Specific Pricing ("DSP").
 - 8. The Cities interests are different from those of the general public.

WHEREFORE, the Cities of Warrensburg, O'Fallon and Weldon Spring, respectfully requests the Commission to grant its Application to Intervene.

Respectfully submitted,

CURTIS, OETTING, HEINZ GARRETT & SOULE, P.C.

Leland B. Curtis, #20550 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (Fax)

Attorneys for City of Warrensburg

CERTIFICATE OF MAILING

A true and correct copy of the foregoing was mailed this 15 hday of 1999, by placing same in the U.S. Mail postage prepaid to: Dean L. Cooper/W.R. England, III, Brydon, Swearengen & England, P.C., 312 E. Capitol Avenue, P. O. Box 456, Jefferson City, Missouri 65102; Office of the Public Counsel, P. O. Box 7800, Jefferson City, Missouri 65102 and General Counsel, Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

Leland B. Curtis