

City  
of

*Joplin*

Office of the City Attorney

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November 15, 1999

**FILED**

**NOV 16 1999**

**Missouri Public  
Service Commission**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102

Re: The Matter of Missouri-American Water Company  
Case No. WR-2000-281, Tariff No. 200000366

Dear Mr. Roberts:

Please find enclosed the original and fifteen (15) copies of a proposed Motion to Intervene filed by our office on behalf of the City of Joplin.

If the Motion meets with your approval, please return a stamped, file copy of the same to the undersigned in the self-addressed, stamped envelope enclosed herein for your convenience.

Sincerely,

*Chuck D. Brown* <sup>by DBB</sup>

Chuck D. Brown,  
City Attorney

CDB:ag  
encls.

FILED

NOV 16 1999

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of Missouri-American Water )  
Company's Tariff Sheets Designed to Implement )  
a General Rate Increase for Water Service Provided ) Case No. WR-2000-281  
to Customers in the Missouri Services Area of ) Tariff No. 200000366  
the Company. )

APPLICATION OF JOPLIN, MISSOURI  
TO INTERVENE

Comes now the City of Joplin, Missouri, a Municipal corporation, and moves this Body for an Order allowing it to intervene in this cause, and in support of its Application to Intervene, states:

1. That the Missouri-American Water Company is a corporation duly organized and furnishing water services within the City of Joplin, Missouri.
2. That the City of Joplin, Missouri, and its residents are water users and have a direct and vital interest in the services provided and the rates charged by Missouri-American Water Company within the City of Joplin, Missouri, and that the Applicant herein is a proper party to intervene pursuant to the Rules of Practice and Procedure before the Public Service Commission of the State of Missouri.

3. That if permitted to intervene, the City of Joplin, Missouri, will intervene to protect the interests of the municipality and its residents, in opposition to the proposed Tariff.

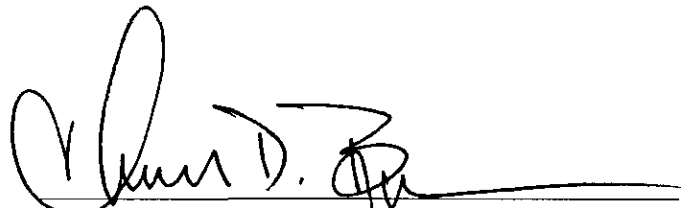
4. That your Applicant will abide by the Schedule of Proceedings previously adopted herein by the Commission and will not seek a delay or postponement of any proceeding now scheduled herein by reason of the granting of this Application.

WHEREFORE, premises considered, the City of Joplin, Missouri, respectfully requests an Order of this Commission:

(a) Permitting the City of Joplin, Missouri, to intervene in this cause to protect the interests of the municipality and its residents;

(b) Permitting the City of Joplin, Missouri, to have notice of any hearing held and an opportunity to be heard in person, or by counsel thereat;

(c) For such other and further relief as the Commission deems just and appropriate in these circumstances.

A handwritten signature in black ink, appearing to read "Chuck D. Brown", is written over a horizontal line.

CHUCK D. BROWN (#32176) City Attorney  
303 East Third Street  
P. O. Box 1355  
Joplin, Missouri 64802-1355  
Phone: (417)624-0820; X225, X227  
ATTORNEYS FOR CITY OF JOPLIN,  
MISSOURI -- INTERVENOR APPLICANT.

STATE OF MISSOURI     )  
                                      )  
COUNTY OF JASPER     )     ss:

On this 15<sup>th</sup> day of November, 1999, before me appeared Chuck D. Brown, City Attorney, for the City of Joplin, Missouri, a Municipal Corporation, and stated that the matters contained in the Application are true according to his best knowledge, information and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal at my office in Joplin, Missouri, the day and year last above written.

My commission expires:

10/22/01

E. Ann Gooch  
Notary Public  
E. Ann Gooch

I hereby certify that a copy of the foregoing was mailed by U.S. Mail, postage pre-paid, to:

Mr. W. R. England, III  
Brydon, Swearengen & England, P.C.  
312 E. Capitol Avenue  
P. O. Box 456  
Jefferson City, Missouri 65102-0456

Office of Public Counsel  
P. O. Box 7800  
Jefferson City, Missouri 65102, this

15<sup>th</sup> day of November,  
1999.

Chuck D. Brown