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Mexico, Missouri 65265-2870

Fax: 573-581-2305

November 16, 1999

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Mr. Dale Hardy Roberts Secretary Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

RE:

Application to Intervene

Case No. WR-2000-281

Dear Mr. Roberts:

Please accept this as the City of Mexico's application to intervene in the Missouri - American Water Company's General Rate Increase for Water Service, Case No. WR-2000-281.

Missouri - American's proposed 53.97% increase in water rates creates a severe rate shock for customers in our community.

As to the City of Mexico's position regarding the company's true-up and test year, we will accept and support the Office of the Public Council's position in these matters.

Best regards,

Dan Parrott

City Manager

DP:ml

cc:

Mr. W. R. England III

Office of the Public Counsel

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

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		Missouri Public Service Commission
In the Matter of Missouri-American Water	)	Service Commission
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 MEXICO, MISSOURI TO INTERVENE

Comes now the City of Mexico, 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 Mexico, Missouri.
- 2. That the City of Mexico, 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 Mexico, 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 Mexico, Missouri, will intervene to protect the interests of the municipality and its residents, in opposition to the shocking rate increase the proposed Tariff will cause.
- 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 Mexico, Missouri, respectfully requests an Order of this Commission:

- (a) Permitting the City of Mexico, Missouri, to intervene in this cause to protect the interests of the municipality and its residents,
- (b) Permitting the City of Mexico, Missouri, to have notice of any hearing held and an opportunity to be heard in person, or by counsel;
- (c) For such other and further relief as the Commission deems just and appropriate in these circumstances.

LOUIS J. LEONATTI

#24011

City/Attorney

Leonatti & Baker, P.C.

P. O. Box 758

Mexico, Missouri 65265

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ATTORNEY FOR CITY OF MEXICO, MISSOURI INTERVENOR APPLICANT