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JUN 0 8 2000

STATE OF MISSOURI MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public Service Commission

In the Matter of Missouri-American)	
Water Company's Tariff Sheets De-	j	
signed to Implement General Rate	j	
Increases for Water and Sewer Ser-	j	
vice provided to Customers in the	j	(Co
Missouri Service Area of the Compa-	j	•
ny	j	

WR-2000-281 SR-2000-282 (Consolidated)

APPLICATION TO INTERVENE

COMES NOW the City of Riverside, pursuant to 4 C.S.R. 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene states:

- 1. The City of Riverside is a municipality located in Platte County and it receives water from Missouri-American Water Company (Missouri-American) through its Parkville ("Platte County") District.
- 2. Correspondence, communications, orders and decisions in this matter should be addressed to:

Jeremiah D. Finnegan, Esq. FINNEGAN, CONRAD & PETERSON, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, Missouri 64111

3. Missouri-American is a corporation with its principal office and place of business located in Missouri. Missouri-American is a water corporation as defined in Section 386.020, RSMo. Supp., and as such is subject to the jurisdiction, supervision and control of the Commission for the distribution and sale

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of water in certain portions of the State of Missouri, including portions of Platte County.

- 4. On October 15, 1999 Missouri-American filed tariffs seeking an increase in water rates including the rates paid by the City of Riverside, its residents and businesses. The resulting final Report and Order in this case may adversely affect the City of Riverside, its residents and businesses.
- 5. The City of Riverside is generally opposed to an increase in water rates and generally supports the position of the St. Joseph Industrial Intervenors opposing Single Tariff Pricing and the disallowance of a portion of the St. Joseph treatment plant.
- 6. That due to a recent change in the City of Riverside's administration, the City reconsidered its position and determined that it was necessary to seek to intervene in these proceedings if at all possible, even at this late date, in order to adequately protect the interests of the City, its residents and businesses with respect to the important issues to be decided in this proceeding.
- 7. That the City has been advised that public hearings have already been held and that the technical phase of the proceedings has already begun. The City has also been advised that if intervention were to be granted that it would have to agree to take the proceedings where it was. That with such knowledge, the City at the Council meeting on the evening of June 6, 2000 agreed to such terms and authorized undersigned counsel to file this Application.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by hand delivery or U.S. mail, postage prepaid addressed to the following persons:

Mr. John Coffman Assistant Public Counsel Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102

Mr. Dean Cooper Brydon, Swearengen & England, P.C. 312 East Capitol Avenue P. O. Box 456 Jefferson City, MO 65102-0456

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Ms. Lisa M. Robertson City of St. Joseph City Hall, Room 307 11th & Fraderick Ave. St. Joseph, MO 64501

Ms. Diana Vuylsteke Bryan Cave, LLP One Metropolitan Square Suite 3600 St. Louis, MO 63102-2750

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Dated: June 8, 2000

Ms. Shannon Cook Assistant Public Counsel Office of the Public Counsel P. C. Box 7800 Jefferson City, MO 65102

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Mr. Joseph W. Moreland Attorney Blake & Uhlig, P.A. 2500 Holmes Road Kansas City, MO 64108

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Jeremiah D. Finnegar

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