

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of Missouri American)
Water Company’s Request for)
Authority to Implement a General Rate) Case No. WR-2011-0337
Increase for Water and Sewer Service)
Provided in Missouri Service Areas)

APPLICATION TO INTERVENE OF THE CITY OF RIVERSIDE, MISSOURI

COMES NOW, the City of Riverside, Missouri (“Riverside” and the “City”), a fourth class city, by and through undersigned counsel and pursuant to 4 C.S.R. 240-2.075 applies to intervene and become a party in the above titled case. The following suggestions are offered in support thereof:

1. Riverside is a fourth class city located in the County of Platte, State of Missouri, and as such is a customer within the service area of Missouri-American Water Company (“MAWC”), as are the citizens and businesses of Riverside whose health safety and welfare interests it would also represent in this case. The address of Riverside’s principal office is: 2950 NW Vivion Road, Riverside, Missouri 64150, and its telephone number is: (816) 741-3993.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Joseph P. Bednar, Jr.
Spencer, Fane, Britt & Browne LLP
308 East High Street, Suite 222
Jefferson City, MO 65101
Telephone No.: (573) 634-8115
Facsimile No.: (573) 634-8140

Eric J. Steinle
Spencer, Fane, Britt & Browne LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106
Telephone No.: (816) 474-8100
Facsimile No.: (816) 474-3216

3. On June 30, 2011, MAWC submitted proposed tariff sheets to the Missouri Public Service Commission (the "Commission") designed to implement a substantial general rate increase for water service provided to customers in its Missouri service territories, including Riverside. On July 5, 2011, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, Setting Hearings, Directing Filings and Setting Procedural Schedule* in this case, directing that interested parties wishing to intervene must do so on or before July 20, 2011. This Application to Intervene is, therefore, timely filed.

4. Pursuant to 4 CSR 240-2.075(4), Riverside states that as a large consumer of water supplied by MAWC, and as a governmental body representing the residents and commercial interests of the City, Riverside has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case. Granting the instant Application to Intervene would serve the public interest.


5. Pursuant to 4 CSR 240-2.075(2), Riverside states that it is opposed to the substantial rate increase proposed in this case by MAWC, but is currently unsure of the specific positions it will take on particular issues in this matter.

6. Riverside's interest in proceedings affecting the rates for water service in the MAWC Platte County service area has been previously recognized by the Commission, in permitting Riverside's intervention in prior MAWC rate related proceedings.

WHEREFORE, for the foregoing reasons, Riverside respectfully requests that the Commission grant Riverside's Application to Intervene in this matter, and thereby entitle Riverside to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses and to be heard on the arguments, and in all other respects fully participate in this proceeding.

Respectfully submitted,

Spencer Fane Britt & Browne LLP

By: 

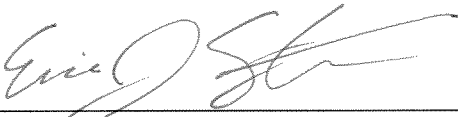
Joseph P. Bednar, Jr. #33921
Eric J. Steinle #59115
308 East High Street, Suite 222
Jefferson City, MO 65101
(573) 634-8115
(573) 634-8140 – facsimile

ATTORNEYS FOR CITY OF RIVERSIDE

ATTORNEY VERIFICATION

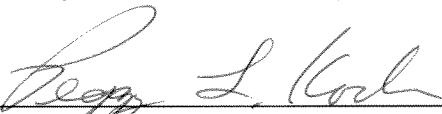
COUNTY OF JACKSON)
) ss.
STATE OF MISSOURI)

I, Eric J. Steinle, being first duly sworn, do hereby certify, depose and state that I am the attorney for the City of Riverside, Missouri, which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.




Eric J. Steinle

Subscribed and sworn to before me, a Notary Public, this 20th day of July, 2011.



Notary Public in and for County and State

[SEAL]



Type or Print Name


My Commission Expires:

PEGGY L. KOCH

Notary Public - Notary Seal
STATE OF MISSOURI
Clay County
My Commission Expires: March 31, 2013
Commission # 09463600

CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), the Office of Public Counsel (at opcservice@ded.mo.gov), counsel for MAWC, and all counsel of record on this 20th day of July, 2011.


Eric J Steinle