

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

In the Matter of Missouri-American )  
Water Company's Request for Authority to ) **Case No. WR-2010-0131**  
Implement a General Rate Increase for )  
Water Service Provided in Missouri ) **Tracking No. YW-2010-0310**  
Service Areas )

**APPLICATION TO INTERVENE**

COMES NOW the City of St. Joseph, Missouri (hereinafter referred to as "St. Joseph"), by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

Lisa Robertson  
City Attorney  
City Hall, Room 307  
1100 Frederick Avenue  
St. Joseph, MO 64501  
Phone: 816-271-4680  
Facsimile: 816-271-4683  
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and

William D. Steinmeier  
Mary Ann (Garr) Young  
WILLIAM D. STEINMEIER, P.C.  
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3. On October 30, 2009, Missouri-American Water Company submitted proposed tariff sheets to the Missouri Public Service Commission designed to implement a substantial general rate increase for water service provided to customers in the Missouri service territories of the Company, including St. Joseph. On November 18, 2009 (as corrected on November 19, 2009), the Commission issued its *Order Suspending Tariff, Directing Filings, Setting Conferences and Hearings, and Directing Notice; and Notice of Contested Case* in this case, directing that interested parties wishing to intervene must do so on or before November 30, 2009. This Application to Intervene is, therefore, timely filed.
4. Pursuant to 4 CSR 240-2.075 (4), St. Joseph states that as a large consumer of water supplied by Missouri-American, and as a governmental body representing the residents and commercial interests of the City of St. Joseph, St. Joseph 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 also serve the public interest.
5. St. Joseph desires to participate fully in this proceeding.
6. Pursuant to 4 CSR 240-2.075 (2), St. Joseph states that it is opposed to the substantial rate increase proposed in this case by Missouri-American, but is currently unsure of the specific position(s) it will take on particular sub-issues in this matter.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant this Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

Respectfully submitted,

***/s/ William D. Steinmeier***

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COUNSEL FOR THE CITY OF ST.  
JOSEPH, MISSOURI

### **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](mailto:gencounsel@psc.mo.gov)), the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), counsel for Missouri-American, and all counsel of record on this 30<sup>th</sup> day of November 2009.

***/s/ William D. Steinmeier***