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December 14, 1999

FILED 2

DEC 1 4 1999

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

Missouri Public Service Commission

RE: Missouri-American Water Company - Consolidated Case Nos. WR-2000-281

SR-2000-282

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of MAWC's Response to MIEC's Application to Intervene. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Dean L. Cooper

DLC/rhg Enclosures

cc: Office of the Public Counsel

Mr. Keith Krueger

Ms. Shannon Cook

Mr. Louis Leonatti

Mr. Jim Fischer

Mr. Leland Curtis

Mr. Brent Stewart

Mr. Chuck Brown

Mr. Joseph Moreland

Mr. Stu Conrad

Ms. Lisa Robertson

## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

| Į | FILED <sup>2</sup> |
|---|--------------------|
|   | DEC 1 4 1999       |

| In the Matter of Missouri-American      | ) | Serviss              | ouri Public<br>Commission |
|---|---|----------------------|---------------------------|
| Water Company's Tariff Sheets Designed  | ) | . «ICe               | Commissio                 |
| to Implement General Rate Increases for | ) | Case No. WR-2000-281 | """Ssion                  |
| Water and Sewer Service provided to     | ) | Case No. SR-2000-282 |                           |
| Customers in the Missouri Service Area  | ) |                      |                           |
| of the Company.                         | ) |                      |                           |

## MAWC'S RESPONSE TO MIEC'S APPLICATION TO INTERVENE

COMES NOW Missouri-American Water Company ("MAWC" or "Company") and, for its Response to the Application to Intervene filed by The Boeing Company, Ford Motor Company and Hussmann Refrigeration (the "MIEC"), states to the Missouri Public Service Commission ("Commission") as follows:

- 1. On or about December 7, 1999, the MIEC filed their Application to Intervene in the above-captioned matter.
- 2. While MAWC does not object to the MIEC's intervention in this matter, it would like to address MIEC's statements regarding their interest in this proceeding.
- 3. The MIEC first state that they are "all large customers of Missouri-American Water Company in St. Louis County." This is not accurate as MAWC currently has no operations in St. Louis County. The MIEC are large customers of St. Louis County Water Company ("SLCWC"), a sister company of MAWC. SLCWC and MAWC are both owned by the same ultimate parent, American Water Works, Inc. However, they remain separate companies and neither has an ownership interest in the other. This case only concerns tariffs which have been filed by MAWC and the result of this case will have an impact only on customers of MAWC.
- 4. MIEC additionally alleges that MAWC's proposal in this case for single tariff pricing "will eventually have a significant impact on customers located in St. Louis County" and



that the "Commission's decision in the present case may adversely impact the MIEC's water rates and the terms and conditions of its water service."

5. Such impacts cannot result from this case. As explained previously, the MIEC are not customers of MAWC. Any attempt to merge SLCWC into MAWC, to place MAWC and SLCWC rates on a single tariff or to "impact the MIEC's water rates and terms and conditions of its service" would require a separate case involving SLCWC and a separate Commission decision.

WHEREFORE, MAWC does not object to a granting of the Application to Intervene filed by the MIEC.

Respectfully submitted,

Dean L. Cooper

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ATTORNEYS FOR MISSOURI-AMERICAN WATER COMPANY

## Certificate of Service

I hereby certify that a true and correct copy of he above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this // th day of December, 1999, to the following:

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