

**Buzz Westfall**  
County Executive

**Saint Louis**  
**COUNTY**  
**COUNTY COUNSELOR**

**Patricia Redington**  
County Counselor

October 30, 2001

**FILED<sup>2</sup>**

NOV 02 2001

Missouri Public  
Service Commission

Missouri Public Service Commission  
Attn: Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
200 Madison Street, Suite 100  
P. O. Box 360  
Jefferson City, MO 65102-0360

**Re: Case No. WC-2002-146**

Dear Secretary Roberts:

Enclosed for filing please find an **Original and eight copies** of the APPLICATION TO INTERVENE OF ST. LOUIS COUNTY, MISSOURI in the above styled complaint. Will you please bring this matter to the attention of the Commission at your earliest convenience.

Thank you for your assistance and cooperation in this matter.

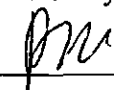
Very truly yours,



Brent C. Cantor  
Assistant County Counselor  
MBE# 43479  
41 South Central  
Clayton MO 63105  
314 615-7042  
314 615-3732  
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Certificate of Service

Copies of this transmittal and its attachments have on the date below indicated been sent to the **Office of Public Counsel**, to the Respondent of Record, and to the **General Counsel** to the Missouri Public Service Commission by prepaid U.S. Mail.

 10/30/01 .

FILED<sup>2</sup>

NOV 02 2001

Missouri Public  
Service Commission

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

Staff of the Missouri Public Service  
Commission, )  
Complainant, )  
vs. )  
St. Louis County Water Company, )  
d/b/a Missouri-American Water Company, )  
Respondent. )

Case No. WC-2002-146

**APPLICATION TO INTERVENE**

Comes now St. Louis County, Missouri, pursuant to 4 CSR 240-2.075, and for its  
Application to Intervene in the above cause, states:

1. St. Louis County, Missouri (hereinafter "Intervenor County") is a constitutional charter county.
2. Intervenor County's interest in the above styled complaint arises out of the fact that Intervenor County is the beneficiary of funds collected pursuant to the tariff that is the subject of the Complaint filed by the Staff of the Missouri Public Service Commission.
3. Intervenor County is opposed to the relief sought by the Complainant Staff of the Missouri Public Service Commission.
4. Intervenor County has an interest different from that of the general public because Staff's Complaint seeks to affect funds that have been and will be in the future collected on behalf of Intervenor County pursuant to a state statute, an Ordinance of Intervenor County and a Contract between Intervenor County and Respondent.
5. Intervenor County may be adversely affected by a final order arising from the instant case because funds being collected pursuant to Respondent's tariff are necessary to pay for repairs to service lines of Intervenor County's constituents,

and Staff's Complaint seeks to reduce those funds and unnecessarily complicate Respondent's collection of such funds.

6. Granting the Intervention of Intervenor County will be in the public interest, because it is imperative that questions about implementation of the service line repair program should include input from the government responsible for representing the interests of the residents of St. Louis County, Missouri.

WHEREFORE, Intervenor County requests that the Commission grant its Application to Intervene in the instant Complaint.

Respectfully submitted,

PATRICIA REDINGTON  
County Counselor  
By:



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Brent C. Cantor

10/30/01