

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**APPLICATION TO INTERVENE
OF BJC HEALTHCARE**

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure, comes now BJC HealthCare, hereinafter referred to as “Applicants” or “BJC”), who hereby applies for leave to intervene in the above-referenced proceeding. In support of this Application, Applicant respectfully states as follows:

1. BJC is a not-for-profit hospital system located within the state of Missouri that has purchased substantial amounts of water from Missouri-American Water Company (“MAWC”) and has actively participated in previous cases involving MAWC and its predecessor, St. Louis County Water Company, before this Commission.
2. As a large-use customer, the rates and terms and conditions of the water service of Applicant may be substantially and uniquely affected by the outcome of this case. Applicant’s interests in this matter cannot be adequately represented by any other party.
3. It is the position of Applicant that revenue requirements should be determined on the basis of total cost of service and that rates for each class should be determined using an appropriate classification and allocation of those costs. Parties traditionally involved in water cases have differing views on the appropriate level of costs, the treatment of costs, their causative factors, the cost allocation methodology to be used, and the intra-class rate design. It is

only with a reasoned analysis of all parties' methods that all of the parties' interests can be adequately represented.

4. Granting intervention by Applicant in this case will serve the public interest by assisting the Commission in developing a more complete record for its decision; and

5. Correspondence or communications regarding this application, including service of all notices and orders of this Commission shall be addressed to:

Lisa C. Langeneckert
Sandberg Phoenix & von Gontard P.C.
600 Washington Avenue – 15th Floor
St. Louis, MO 63101-1313
llangeneckert@sandbergphoenix.com

WHEREFORE, having stated the grounds for intervention and the position and interest of Applicant in these proceedings, Applicant asks that the Commission grant this Application to Intervene and thereby entitle Applicant to participate fully in this proceeding.

SANDBERG PHOENIX & von GONTARD P.C.

By: 

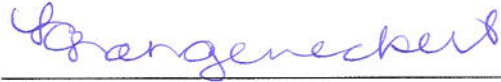
Lisa C. Langeneckert, #49781
600 Washington Avenue – 15th Floor
St. Louis, MO 63101-1313
314-446-4238
314-241-7604 (Fax)
E-mail: llangeneckert@sandbergphoenix.com

Attorneys for BJC HealthCare

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. WR-2011-0337.

Dated at St. Louis, Missouri this 20th day of July, 2011.



Lisa C. Langeneckert