

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

In the Matter of the Application of	)	
Missouri-American Water Company	)	
For Approval to Establish an	)	WO-2004-0116
Infrastructure System Replacement	)	Tariff No. YW-2004-0274
Surcharge	)	

**APPLICATION TO INTERVENE OUT OF TIME  
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now The Boeing Company, DaimlerChrysler, Ford Motor Company, Hussmann Refrigeration, Monsanto Company and Pfizer, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 (4) and 4 CSR 240-2.080, files its Application to Intervene Out of Time. In support of its Application, the MIEC states as follows:

1. The MIEC is a group of large customers of Missouri American Water Company, and the rates, terms and conditions of the MIEC's water service may be affected by the outcome of this case;
2. The MIEC's interest in this case is to ensure that Missouri-American provides water service to the MIEC under reasonable terms and conditions at just and reasonable rates;
3. As a group of large customers of Missouri-American, the MIEC's interest in this proceeding is different than that of the general public;
4. Good cause exists to grant this Application. The MIEC will accept the record as it stands in this proceeding, and its intervention will not prejudice any party. Counsel for the MIEC has spoken with attorneys for Missouri-American, the Missouri Energy


Group, the Office of Public Counsel and the Commission Staff, and is authorized to state that none of these parties objects to the MIEC's intervention.

5. Granting the MIEC's proposed intervention would serve the public interest by assisting in the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene Out of Time herein and make it a party to this case for all purposes.


Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have mailed by first class United States Mail, postage prepaid, to all persons required by the Commission to be served, this 30<sup>th</sup> day of October, 2003.

  
Diana M. Vuylsteke