

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

In the Matter of the Petition of Missouri-American)	
Water Company for Approval to Change its)	<u>Case No. WO-2007-0043</u>
Infrastructure System Replacement Surcharge)	Tariff No. YW-2007-0070
(ISRS))	

**VERIFIED APPLICATION OF UTILITY WORKERS
UNION OF AMERICA LOCAL 335, AFL-CIO, TO INTERVENE**

COMES NOW Utility Workers Union of America Local 335, AFL-CIO ("Local 335"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 204-2.075. In support of this application, Local 335 states as follows:

1. This matter involves an application of Missouri-American Water Company ("MAWC") to increase its current tariff rate schedules and charges, as more fully described in the petition and proposed tariff filed on behalf of Missouri American Water Company dated August 3, 2006.
2. Local 335 is a labor organization that represents approximately 300 employees of MAWC in a bargaining unit in St. Louis County, Missouri. Local 335 has a collective bargaining agreement with MAWC which establishes the terms and conditions of employment for the water company's production, construction, maintenance, operation, distribution, and clerical employees.
3. Local 335 is an unincorporated association. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, Local 335 does not have evidence of any such registration. Further, Local 335

does not have an office or place of business in any traditional sense. In general, persons wishing to contact Local 335 may contact the union through its president at the address and telephone number listed here:

Clara Faatz
314-991-3404 station 254 (work)

Since all Local 335 officers are employees of MAWC, the water company can easily contact them, and company-union business may be conducted at the water company's offices.

4. All correspondence, filings, communications, orders, and decisions of the Missouri Public Service Commission here should be sent to:

Sherrie A. Schroder or
Janine M. Martin
Hammond, Shinnars, Turcotte, Larrew & Young, P.C.
7730 Carondelet, Ste. 200
St. Louis, MO 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Facsimile)
saschroder@hstly.com
jmartin@hstly.com

5. Local 335 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

6. Local 335 does not have any annual reports or assessment fees that are overdue.

7. Local 335 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

8. As the exclusive collective bargaining representative of certain of MAWC's non-managerial, non-professional employees, Local 335 and the employees it represents

have interests in this proceeding which are clearly different from those of MAWC, the general public, or any other party. Where the public's interests here are concentrated in the dependable delivery of clean, untainted water at a reasonable cost, Local 335 and the employees it represents are additionally concerned with the impact the proposed tariffs could have on jobs, pensions, and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

9. Local 335 does not have sufficient information about the proposed tariffs to take a position at this time and, thus, is unsure of the position it will take in this proceeding. Because of the perceived complexity of this case, it is possible that Local 335 will not take the same position on each aspect of the case.

10. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 335 and the employees it represents here.

WHEREFORE, Utility Workers Union of America Local 335, AFL-CIO, respectfully asks the Commission to grant this application and to permit Local 335 to intervene here.

/s/ Sherrie A. Schroder
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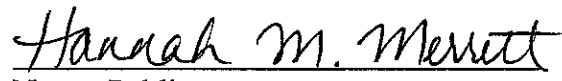
VERIFICATION

COMES NOW Sherrie A. Schroder and, upon her oath, states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information and belief. Ms. Schroder further states that she has been authorized to sign and file this application on behalf of Utility Workers Union of America Local 335, AFL-CIO.

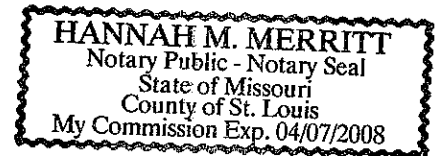

SHERRIE A. SCHRODER

Subscribed and sworn to before me this August 24, 2006.

My Commission Expires:


Notary Public

Certificate of Service



The undersigned hereby certifies that a copy of the foregoing has been mailed or electronically mailed to the following, this August 24, 2006:

General Counsel Office
Missouri Public Service Commission
GenCounsel@psc.mo.gov

Mills Lewis
Office Of Public Counsel
opcservice@ded.mo.gov

Sullivan G Mary
Missouri-American Water Company
mary.sullivan@amwater.com

/s/ Sherrie A. Schroder _____