## 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 Water and Sewer Service Provided in)Missouri Service Areas)

WR-2011-0337

## APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

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

- 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 will be affected by the outcome of this case;
- The MIEC's interest in this case is to ensure that Missouri-American Water Company provides water service to the MIEC under reasonable terms and conditions at just and reasonable rates;
- 3. As a group of large industrial customers of Missouri-American Water Company, the MIEC's interest in this proceeding is different than that of the general public;
- 4. The MIEC does not yet have sufficient information to take a position regarding Missouri-American Water Company's Application, but reserves the right to take positions on all issues that may affect its members in this case.

5. Good cause exists to grant this application. Granting the MIEC 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 herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke\_

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Attorney for the MIEC

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 20<sup>th</sup> day of July, 2011, to all parties on the Commission's service list in this case.

/s/ Diana M. Vuylsteke\_\_\_\_\_