

Blitz Bardgett & Deutsch, L.C.

Attorneys at Law

Robert D. Blitz
John E. Bardgett, Sr.
James B. Deutsch
Richard B. Rothman
Robert C. O'Neal
R. Thomas Avery
Thomas W. Rynard
Ellen W. Dunne
Marc H. Ellinger
Peter C. Palumbo III
Bret M. Kanis
Jillian A. Carey

308 East High Street, Suite 301
Jefferson City, Missouri 65101-3237
Telephone (573) 634-2500
Facsimile (573) 634-3358
E-Mail atty@blitzbardgett.com

120 South Central, Suite 750
St. Louis, Missouri 63105-1794
Telephone (314) 863-1500
Facsimile (314) 863-1877

June 17, 2003

FILED³

JUN 17 2003

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

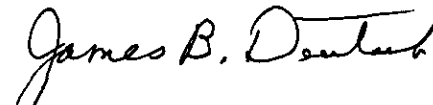
RE: Case No.: WR-2003-0500
Missouri American Water Company 2003 Rate Increase

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of Application to Intervene of City of Joplin, Missouri.

Copies of this filing have on this date been mailed to counsel of record. Thank you for your attention to this matter.

Sincerely,



James B. Deutsch

JBD:krw

Enclosures

cc: Office of the Public Counsel
W. R. England, III

FILED³

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

JUN 17 2003

**Missouri Public
Service Commission**

)	Case No. WR-2003-0500
In the Matter of Missouri American Water)	Tariff Nos. YW-2003-2012
Company's Tariff to Revise Water and)	YW-2003-2013
Sewer Rate Schedules)	YW-2003-2014
)	YW-2003-2015

APPLICATION TO INTERVENE OF CITY OF JOPLIN, MISSOURI

COMES NOW the City of Joplin, by and through counsel, pursuant to 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case, and in support of its Application to Intervene states as follows:

1. The City of Joplin (Joplin) is a municipality located in Jasper County, Missouri, and receives its water service from Missouri American Water Company (hereinafter MAWC). The City of Joplin also represents the interests of its citizens, who likewise receive their water service from MAWC.

2. Joplin's interest in proceedings affecting the rates for water service in the MAWC Joplin District has been previously recognized by the Missouri Public Service Commission, in permitting Joplin's intervention in prior MAWC rate-related proceedings.

3. On May 19, 2003, MAWC filed proposed tariffs reflecting an annual revenue increase of \$20 million, an increase of 12.2% in rates. These proposed tariffs may be unjust, unreasonable and unduly discriminatory, in violation of law.

4. On May 29, 2003, the Missouri Public Service Commission issued an Order suspending the proposed rates and tariffs and directing an investigation of the proposals, setting an intervention deadline, scheduling a hearing, and setting a pre-hearing conference. This Application

to Intervene is timely under that Order.

5. Joplin states, pursuant to 4 CSR 240-2.075(2), that it is opposed to any unreasonable or unjust increase in water rates that would create financial hardship or undue discrimination to its citizens and businesses, and to the City of Joplin itself.

6. The granting of the proposed intervention would serve the public interest.

7. Correspondence, communications, orders and decisions in this matter should be addressed to:

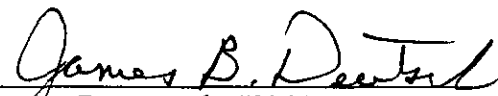
James B. Deutsch
Marc H. Ellinger
Blitz, Bardgett & Deutsch, L.C.
308 East High Street, Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358

WHEREFORE, for the foregoing reasons, the Intervenor City of Joplin respectfully requests that the Commission grant this Application to Intervene in this matter.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

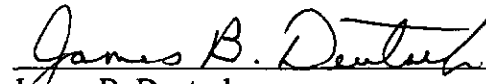

James B. Deutsch, #27093
Marc H. Ellinger, #40828
308 East High Street
Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358

CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene were sent to each of the following persons by postage paid U.S. Mail, this 17th day of June, 2003:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

W. R. England, III, Esq.
Brydon, Swearengen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456


James B. Deutsch