

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

In the Matter of the Petition of Missouri        )  
American Water Company for Approval to        )        Case No. WO-2021-0428  
Establish a Water and Sewer Infrastructure     )  
Rate Adjustment ("WSIRA")                    )

**APPLICATION TO INTERVENE**

COMES NOW the Midwest Energy Consumers' Group ("MECG"), pursuant to 20 CSR 4240-2.075 of the Commission's Rules of Practice and Procedure and the Commission's September 9, 2021 *Order Directing Notice, Setting Deadlines, Directing Filings, and Suspending Tariff*, and for its Application to Intervene respectfully states as follows:

1.        The Midwest Energy Consumers Group is an incorporated entity representing the interests of large commercial and industrial users of electricity, water and natural gas throughout the State of Missouri including in the areas served by Missouri-American Water Company ("MAWC").

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

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3.        On September 3, 2021, MAWC filed its petition to establish water and sewer infrastructure rate adjustments (WSIRAs) under newly enacted Sections 393.1500-1509, RSMo. MAWC also requested that the Commission approve its proposed customer notices and filed tariff sheets to implement the WISIRAs. The matters to be considered in this case and the

Commission's determinations thereon, could have a direct and significant impact on cost of service to large commercial and industrial customers.

4. Granting this proposed intervention would serve the public interest and would assist the Commission in the development of a more complete record. MECG's interest is direct, immediate, unique, different from that of the general public, and will not or cannot be adequately represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that MECG be permitted to intervene in this proceeding to protect its interest.

WHEREFORE, MECG prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings, to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

Respectfully submitted,

WOODSMALL LAW OFFICE

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ATTORNEY FOR THE MIDWEST ENERGY  
CONSUMERS' GROUP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall  
David Woodsmall

Dated: September 28, 2021