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May 27, 2003

**FILED**  
MAY 28 2003  
Missouri Public  
Service Commission

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102-0360

**Re: In the Matter of the General Rate Increase for Water and Sewer  
Service Provided by Missouri-American Water Company  
Case No. WR-2003-0500**

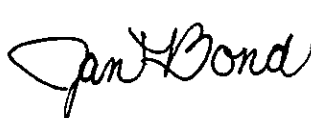
Dear Judge Roberts:

I am enclosing an original and nine (9) copies each of an Entry of Appearance and the Verified Application of Utility Workers Union of America Local 335, AFL-CIO, To Intervene in the referenced matter.

I would appreciate the Commission stamping a copy of each of the two documents as received and returning them to me in the enclosed stamped, self-addressed envelope.

Thank you for your cooperation in this matter.

Very truly yours,



JAN BOND

JB:nea

Enclosures

cc: Ruth O'Neill, Esq. (w/encs.)  
William R. England, III, Esq. and Dean L. Cooper, Esq. (w/encs.)  
David P. Abernathy, Esq. (w/encs.)

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

**IN THE MATTER OF THE GENERAL )  
RATE INCREASE FOR WATER AND )  
SEWER SERVICE PROVIDED BY )  
MISSOURI-AMERICAN WATER )  
COMPANY. )**

Case No. WR-2003-0500

**FILED**  
MAY 28 2003  
Missouri Public  
Service Commission

**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 to increase its current tariff rate schedules and charges, as more fully described in the letter filed on behalf of Missouri American Water Company dated May 19, 2003.

2. Local 335 is a labor organization that represents approximately 300 employees of Missouri-American Water Company in a bargaining unit in St. Louis County, Missouri. Local 335 has a collective bargaining agreement with Missouri-American Water Company 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 on the

attached "Union Appendix 1." Since all Local 335 officers are employees of Missouri-American Water Company, 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:

Jan Bond  
Diekemper, Hammond, Shinnars, Turcotte and Larrew, P.C.  
7730 Carondelet, Ste. 200  
St. Louis, MO 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Facsimile)  
janbond@dhstl.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.

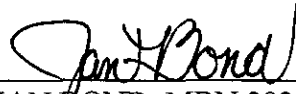
7. Local 335 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

8. As the exclusive collective bargaining representative of certain of Missouri-American Water Company'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 Missouri-American Water Company, 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.




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Attorneys for Utility Workers Union of America  
Local 335, AFL-CIO

**VERIFICATION**

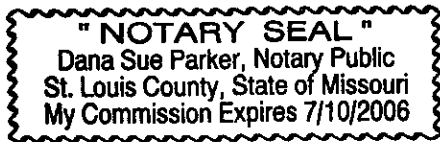
COMES NOW Jan Bond and, upon her oath, states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information and belief. Ms. Bond further states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

  
\_\_\_\_\_  
JAN BOND

Subscribed and sworn to before me this 27<sup>th</sup> day of May, 2003.

My Commission Expires:

  
\_\_\_\_\_  
Notary Public



**Union Appendix 1**

Alan Ratermann  
4118 Domenique  
Florissant, Missouri 63034  
Home: (314) 839-4056  
President of Local 335

**CERTIFICATE OF SERVICE**

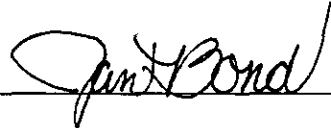
The undersigned hereby certifies that a copy of the foregoing was sent by US mail, first-class postage pre-paid, this 27th day of May, 2003, to:

The Honorable Dale Hardy Roberts  
Secretary  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102-0360

Ruth O'Neill, Esq.  
Office of the Public Counsel  
PO Box 7800  
Jefferson City, MO 65102-7800

David P. Abernathy, Esq.  
Vice President and General Counsel  
Missouri-American Water Company  
535 N. New Ballas Rd.  
St. Louis, MO 63141-6810

William R. England, III, Esq.  
Dean L. Cooper, Esq.  
Brydon, Swearngen & England  
312 E. Capitol Ave.  
Jefferson City, MO 65102-0456

  
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