

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

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

APPLICATION TO INTERVENE

COMES NOW the City of St. Joseph, Missouri, by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 20 CSR 4240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri (MO) 64501.
2. All communications and pleadings in this case should be served on:

William D. Steinmeier
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive
Jefferson City, Missouri (MO) 65109
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3. On September 3, 2021, Missouri-American Water Company (MAWC) filed *MAWC’S Petition to Establish a Water and Sewer Infrastructure Rate Adjustment and Motion for Approval of Customer Notice*.
4. On September 9, 2021, the Commission issued its *Order Directing Notice, Setting Deadlines, Directing Filings, and Suspending Tariffs*. *Inter alia*, that Order established September 29, 2021 as the deadline

for applications to intervene. Thus, the instant *Application to Intervene* is timely.

5. The City of St. Joseph is a large consumer of water service supplied by Missouri-American and is thereby directly affected by its rates. As a municipal government, the City interacts with Missouri-American for various purposes in public works projects and otherwise and is affected by Missouri-American's rules, regulations and operations. The City is also a governmental body representing the residents and commercial interests of the City. For each of these reasons, the City of St. Joseph has an interest in this case which is different from that of the general public and which may be adversely affected by a final order arising out of this case. Granting the instant *Application to Intervene* would serve the public interest.
6. The City of St. Joseph states that it is still reviewing the Company's Petition in this case and does not yet take a position on the merits.

WHEREFORE, the City of St. Joseph, Missouri respectfully requests that the Missouri Public Service Commission grant this Application to Intervene and make St. Joseph a party to this proceeding.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR THE CITY OF
ST. JOSEPH, MISSOURI

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at staffcounsel@psc.mo.gov), on the Office of the Public Counsel (at opcservice@opc.mo.gov) and on all parties of record on this 28th day of September 2021.

/s/ William D. Steinmeier

William D. Steinmeier