

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

In the Matter of Missouri-American Water	)	
Company for Approval to Establish an	)	Case Nos. WO-2018-0059
Infrastructure System Replacement	)	
Surcharge (ISRS)	)	

**APPLICATION TO INTERVENE  
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers (“MIEC”) and pursuant to 4 CSR 240-2.075 and this Commission’s August 29, 2017 *Order Directing Notice, Setting Intervention Deadline, and Directing Filing*, files its Application to Intervene. In support of its Application, the MIEC states as follows:

1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of Missouri-American Water Company, and the rates, terms and conditions of the industrial customers’ water service will be affected by the outcome of this case.
2. The MIEC’s interest in this case is to ensure that Missouri-American Water Company provides water service to its customers under reasonable terms and conditions at just and reasonable rates.
3. As a representative of large industrial customers of Missouri-American Water Company, the MIEC has an interest in this proceeding that is different than that of the general public.
4. The MIEC does not yet have a position, and reserves the right to take positions on specific issues as this case proceeds.

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

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Energy Consumers

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 11<sup>th</sup> day of September, 2017, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey