

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

In the Matter of Petition of Missouri-American)
Water Company for Approval to Establish an) Case No. WO-2017-0297
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 May 16, 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 non-profit corporation consisting of corporations that are large consumers of utilities, including some who are customers of Missouri-American Water Company, and the rates, terms and conditions of the MIEC’s members’ 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 the MIEC members under reasonable terms and conditions at just and reasonable rates;

3. As large industrial customers of Missouri-American Water Company, the MIEC’s members’ interest in this proceeding is different than that of the general public;

4. The MIEC does not yet have a position on the issues in this case 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,

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By: /s/ Edward F. Downey

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Attorneys for the Missouri Industrial
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 30th day of May, 2017, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey