BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water Company's)	
Request for Authority to Implement A General Rate)	WR-2011-0337
Increase for Water and Sewer Service Provided in)	
Missouri Service Areas)	

MOTION OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now The Boeing Company, Hussmann Refrigeration, Monsanto, and Mallinckrodt, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC") and pursuant to 4 CSR 240-2.075 files its Application to Intervene.

For their motion, the MIEC states as follows:

- On July 5, 2011, the Commission issued its Order Directing Notice, Setting
 Intervention Deadline, Setting Hearings, Directing Filings and Setting Procedural
 Schedule (the "Scheduling Order") in this case.
- On July 20, 2011, MIEC filed an Application to Intervene with the Commission. The Commission granted MIEC's intervention as of July 25, 2011.
- 3. Pursuant to the Scheduling Order, a prehearing conference was held on July 28, 2011 at 9:30 a.m.
- 4. Due to an administrative error, counsel for MIEC did not attend the prehearing conference.

- 5. MIEC intends to participate fully in all scheduling conferences and hearings in this case. As a group of large industrial customers of Missouri American located in St. Louis County, MIEC's interests cannot be represented by any other party.
- 6. This case will have a significant impact on the MIEC, and the administrative error giving rise to MIEC's non-attendance at the July 28 prehearing does not reflect a lack of interest by MIEC or intent to participate less than fully in this proceeding.

WHEREFORE, the MIEC respectfully requests that it be excused from the July 28 prehearing conference.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke_

Diana M. Vuylsteke, # 42419 211 N. Broadway, Suite 3600 St. Louis, Missouri 63102

Telephone: (314) 259-2543 Facsimile: (314) 259-2020

E-mail: dmvuylsteke@bryancave.com

Attorney for the MIEC

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 3^{rd} day of August, 2011, to all parties on the Commission's service list in this case.

<u>/s/ Diana M. Vuylsteke</u>