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)	Case Nos. WR-2015-0301
Increase for Water and Sewer Service Provided in)	and SR-2015-0302
Missouri Service Areas)	

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 5, 2015 *Order Suspending Tariff, Directing Notice, Setting Hearings and Directing Filings*, 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 opposes at least some of the relief sought by Missouri-American Water Company 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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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 7th day of August, 2015, to all parties on the Commission's service list in this case.

<u>/s/ Edward F. Downey</u>