

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

In the Matter of Missouri-American Water)	
Company’s Request for Authority to Implement)	<u>File No. WR-2017-0285</u>
General Rate Increase for Water and Sewer)	<u>File No. WR-2017-0286</u>
Service Provided in Missouri Service Areas.)	

**MISSOURI DIVISION OF ENERGY’S
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development – Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Missouri Public Service Commission (“Commission”) grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On June 30, 2017, Missouri-American Water Company (“Missouri American” or “Company”) filed tariff sheets designed to implement a general rate increase for water and sewer services.
2. On July 5, 2017, the Commission issued its *Order Directing Notice, Consolidating Cases, Establishing Deadline, and Setting Procedural Conference*. This *Order* set July 25, 2017 as the deadline for intervention.
3. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

¹ On August 28, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development”

4. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;² consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.³ DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

5. DE was granted intervention in the Company's previous rate case (WR-2015-0301). In that case, DE's witnesses filed testimony in favor of supply- and demand-side efficiency initiatives, as well as testimony supporting rate designs that encourage efficient consumption. Missouri American and DE have worked together to implement supply- and demand-side efficiency initiatives as a result of stipulations signed in that case.

6. DE expects to develop its positions on specific issues as this case proceeds.

7. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned.

² §§ 640.676 and 640.150.2 RSMo.

³ § 640.150.1 RSMo.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Brian Bear

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 19th day of July, 2017.

/s/ Brian Bear

Brian Bear