

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

In the Matter of the Application of Missouri-)	
American Water Company for an Accounting)	<u>File No. WU-2017-0296</u>
Order Concerning MAWC's Lead Service)	
Line Replacement Program)	

**APPLICATION TO INTERVENE OUT OF TIME OF THE
MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT**

COMES NOW the Missouri Department of Economic Development ("DED") and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Missouri Public Service Commission ("Commission") grant intervention out of time to DED in the above-styled matter. For its *Application to Intervene*, DED states as follows:

1. On May 12, 2017, Missouri-American Water Company ("MAWC") filed a request seeking an Accounting Authority Order ("AAO") for the cost of replacing the customers' portion of MAWC's lead service lines.

2. On May 15, 2017, the Commission issued an *Order Directing Notice* which included an intervention deadline of May 30, 2017. Given this deadline, DED recognizes that this *Application to Intervene* is out of time.

3. DED is a state agency vested with the powers and duties set forth in § 620.010.1 through § 620.030.1 RSMo., as well as § 640.150 RSMo. through §640.160 RSMo., and § 640.651 RSMo. through § 640.686 RSMo.

4. DED works to create an environment that encourages economic growth by supporting Missouri's businesses and diverse industries, strengthening the state's

communities, developing a talented and skilled workforce, and maintaining a high quality of life. Consequently, DED has an interest different than that of the general public, and its intervention will serve a public interest in that DED will evaluate MAWC's request from a formal state policy and planning perspective, with a specific interest in promoting the economic development of the State.

6. Among DED's interests in this proceeding is ensuring that Missouri communities have access to water supplies that maintain a high quality of life and support the growth of businesses and diverse industries. Strong Missouri communities depend on safe and adequate water supplies available at just and reasonable rates; it is in the interest of these communities to ensure equal access to service line replacements. Missouri's workforce will also be an important part of any initiative that provides safe, affordable water supplies. In addition, this case may involve opportunities to improve the efficiency of water supply processes by reducing the amount of water, energy, and other chemicals wasted due to leaks. Finally, the case could involve matters that interact with DED-supported programs (such as Community Development Block Grants) or work undertaken in collaboration with other agencies (such as the Department of Natural Resources and the Department of Agriculture).

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

WHEREFORE, the Missouri Department of Economic Development respectfully requests that the Commission grant DED's *Application to Intervene* out of time 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 27th day of June, 2017.

/s/ Brian Bear

Brian Bear