

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

In the Matter of the Application of)
Missouri-American Water Company for an) Case Nos. WU-2017-0351
Accounting Authority Order Related to Property)
Taxes in St. Louis County and Platte County)

**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 June 30, 2017 *Order Directing Notice, Establishing Intervention Deadline and Directing Staff to File Recommendation*, files its Application to Intervene. In support of its Application, the MIEC states as follows:

1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of Missouri-American Water Company, and the rates, terms and conditions of the industrial customers’ 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 its customers under reasonable terms and conditions at just and reasonable rates;
3. As a representative of large industrial customers of Missouri-American Water Company, the MIEC has an interest in this proceeding that is different than that of the general public;
4. The MIEC does not yet have a position, 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,

BRYAN CAVE, LLP

By: /s/ Edward F. Downey

Edward F. Downey, # 28866
Lewis R. Mills, #35275
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone: (573) 556-6620
Facsimile: (573) 556-6630
E-mail: efdowney@bryancave.com
lewis.mills@bryancave.com

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

Attorneys for the Missouri Industrial
Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 6th day of July, 2017, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey