

City of St. Joseph

1100 Frederick Avenue, St. Joseph, Missouri 64501

December 2, 1999

FILED

DEC 6 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65101

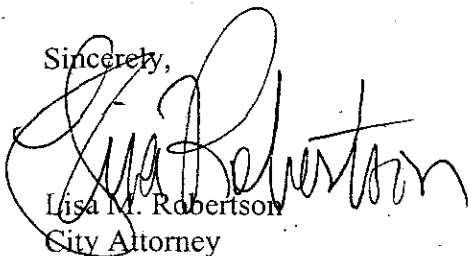
**Missouri Public
Service Commission**

Re: Missouri-American Water Company – Case No.: WR-2000-281 – Tariff No.: 200000366

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the “Application of St. Joseph, Missouri to Intervene” in the above-captioned matter. If you have any questions, please feel free to contact me.

Sincerely,



Lisa M. Robertson
City Attorney

LMR:scs

Enclosures

cc: Office of the Public Counsel
General Counsel, PSC
Louis J. Leonatti, Leonatti & Baker, P.C.
Leland B. Curtis, Curtis, Oetting, Heinz, Garrett & Soule, P.C.
W.R. England, III, Brydon, Swearngen & England, P.C.
Larry Stobbs, Mayor
Stet Schanze, City Manager
Pam Windsor, Assistant City Manager
Vince Capell, Director of Finance
Bruce Woody, Director of Public Works & Transportation

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

FILED

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Missouri Public
Service Commission

IN THE MATTER OF MISSOURI-)
AMERICAN WATER COMPANY'S)
TARIFF SHEETS DESIGNED TO)
IMPLEMENT A GENERAL RATE)
INCREASE FOR WATER SERVICE)
PROVIDED TO CUSTOMERS IN THE)
MISSOURI SERVICE AREA OF THE)
COMPANY.)

Case No.: WR-2000-281

Tariff No.: 200000366

APPLICATION OF ST. JOSEPH, MISSOURI
TO INTERVENE

COMES NOW the City of St. Joseph, Missouri, a constitutional charter city organized under the laws of the State of Missouri, and hereby moves this Body for an Order allowing it to intervene in this cause, and in support of its Application to Intervene, states:

1. That the Missouri-American Water Company is a corporation duly organized and furnishing water services within the City of St. Joseph, Missouri.
2. That the residents of the City of St. Joseph, Missouri, are water users who have a direct and vital interest in the services provided and the rates charged by Missouri-American Water Company within the City of St. Joseph, Missouri.
3. That the City of St. Joseph, Missouri, is a proper party to intervene pursuant to the Rules of Practice and Procedure before the Public Service Commission of the State of Missouri.
4. That if permitted to intervene, the City of St. Joseph, Missouri, will intervene to protect the interests of the municipality and its residents.

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December, 1999, a copy of the foregoing Application of St. Joseph, Missouri to Intervene was mailed by me, first-class postage prepaid, to:

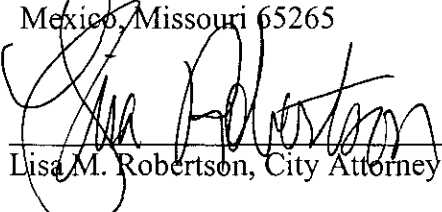
Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102

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Missouri Public Service Commission
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Louis J. Leonatti
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Leland B. Curtis
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& Soule, P.C.
130 S. Bemiston, Suite 200
Clayton, Missouri 63105

W. R. England, III
Brydon, Swearengen &
England, P.C.
312 E. Capitol Avenue, P. O. Box 456
Jefferson City, Missouri 65102



Lisa M. Robertson, City Attorney

5. That the City of St. Joseph, Missouri, will abide by the Schedule of Proceedings previously adopted herein by the Commission and will not seek a delay or postponement of any proceedings now scheduled herein by reason of the granting of this Application.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests an Order of this Commission:

(a) Permitting the City of St. Joseph, Missouri, to intervene in this cause to protect the interests of the municipality and its residents.

(b) Permitting the City of St. Joseph, Missouri, to have notice of any hearing held and an opportunity to be heard in person, or by counsel.

(c) For such other and further relief as the Commission deems just and appropriate in these circumstances.

Respectfully submitted,

ST. JOSEPH CITY ATTORNEY'S OFFICE

By: 

Lisa M. Robertson

#40041

Brian W. Head (Asst.)

#45782

Timothy J. Kissock (Asst.)

#46789

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