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IN ASSOCIATION WITH BRYAN CAVE,
A MULTINATIONAL PARTNERSHIP.
LONDON, ENGLAND

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December 7, 1999

VIA FACSIMILE AND FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, Missouri 65101-1517

FILED
DEC 7 1999
Missouri Public
Service Commission

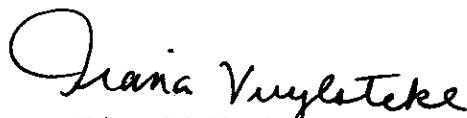
RE: Missouri American Water Company, Case No. WR-2000-281

Dear Judge Roberts:

Enclosed for filing are an original and fourteen (14) copies of the Application to Intervene of the Missouri Industrial Energy Consumers ("MIEC"). Copies of this filing have been mailed to all parties of record.

Please "file-stamp" the extra copy and return it to me in the enclosed, self-addressed stamped envelope. Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,


Diana M. Vuylsteke

cc: All parties w/enclosure (by regular U.S. Mail)
Ernie Harwig

FILED

DEC 7 1999

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Missouri-American Water)
Company's Tariff Sheets Designed to) Case No. WR-2000-281
Implement a General Rate Increase for)
Water Service Provided to Customers in the)
Missouri Service Area of the Company)

APPLICATION TO INTERVENE

Pursuant to 4 CSR 240-2.080 and 4 CSR 240-2.110, The Boeing Company, Ford Motor Company and Hussmann Refrigeration, hereafter collectively referred to as the "Missouri Industrial Energy Consumers" or "MIEC", hereby submit their Application to Intervene. In support of their Application and as grounds therefore, the MIEC state as follows:

1. The MIEC member companies are all large customers of Missouri-American Water Company in St. Louis County.
2. Missouri-American Water Company's proposal in this case for single tariff pricing will eventually have a significant impact on customers located in St. Louis County. If the Commission adopts this proposal in the present case, it will set a precedent that will make it substantially more likely that the Commission will accept this single tariff pricing for other areas served by Missouri-American in the future, particularly St. Louis County.
3. The Commission's decision in the present case may adversely impact the MIEC's water rates and the terms and conditions of its water service.
4. As an organization of large customers, the MIEC's interest in this proceeding is different than that of the general public.


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5. The MIEC's primary reason for seeking intervention is to oppose Missouri-American Water Company's single tariff pricing proposal, but the MIEC reserves the right to take positions on other issues in this case that may eventually affect its members in this case.
6. Granting the MIEC's proposed intervention would serve the public interest by assisting 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 proceeding for all purposes.

Respectfully Submitted,

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ATTORNEY FOR THE MIEC

CERTIFICATE OF SERVICE

I hereby certify that copies of this Application to Intervene has been served by first-class, U.S. mail, postage prepaid, on this 7TH day of December, 1999, to all parties.

