

FILED³

SEP 13 2000

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the Matter of Missouri-American)	
Water Company's Tariff Sheets De-)	
signed to Implement General Rate)	WR-2000-281
Increases for Water and Sewer Ser-)	SR-2000-282
vice provided to Customers in the)	(Consolidated)
Missouri Service Area of the Compa-)	
ny)	

APPLICATION FOR STAY OR IN THE ALTERNATIVE
THAT RATES BE COLLECTED UNDER AN OBLIGATION OF REFUND BY
AG PROCESSING INC, A COOPERATIVE,
FRISKIES PETCARE, A DIVISION OF NESTLE USA AND
WIRE ROPE CORPORATION OF AMERICA INC. AND
CITY OF RIVERSIDE, MISSOURI

COME NOW AG PROCESSING INC, A COOPERATIVE ("AGP"),
FRISKIES PETCARE, A DIVISION OF NESTLE USA ("Friskies") and WIRE
ROPE CORPORATION OF AMERICA INC. ("Wire Rope") and City of
Riverside, Missouri ("Riverside") (hereinafter collectively
"Intervenors") pursuant to their Application for Rehearing filed
contemporaneously herewith under Section 386.500 RSMo. 1994 and
under Section 386.500.3 apply for a Stay of the increased rates
purported to have been authorized by the Commission's Report and
Order of August 31, 2000 (Order), the September 1, 2000 Notice of
Correction of said Order, and the September 12, 2000 Order of
Clarification all concerning Missouri-American Water Company
(hereinafter "MAWC"). In support thereof they state as follows:

1. Intervenors incorporate by reference all prior
paragraphs of their Application for Rehearing of the Report and
Order of August 31, 2000, filed contemporaneously herewith

2. Under Section 386.500.3 the Commission may stay its decision on a matter increasing rates and should do so in this case in that substantial grounds have been provided herein demonstrating that the Order is unlawful, unjust, unreasonable and unconstitutional, is in several aspects arbitrary and capricious, and has been arrived at pursuant to unlawful procedures and would result in rates for the St. Joseph district and the Parkville district from which Riverside receives service that would be unjust, unlawful, unreasonable and unconstitutional.

3. Ratepayers should not be required to pay their moneys under an order that is unlawful, unjust, unreasonable and unconstitutional or is arbitrary and capricious as upon rehearing, should all or portions of such Order be set aside, or upon judicial review of such Order if such Order is not set aside following rehearing, the ratepayers will have been forced to pay money to the utility without the likely potential of obtaining a refund.

4. Alternatively, the Commission should require the collection of such additional revenues from the aforesaid districts only pursuant to an undertaking on the part of the applicant utility that it will refund such amounts as are ultimately determined to have been collected unlawfully pursuant to such an Order.

WHEREFORE for the foregoing reasons, these Intervenor seek and request a Stay of the rate increase purportedly authorized for the St. Joseph district and the Parkville district by the Commission's Report and Order of August 31, 2000 or in the alternative that such increased rates only be permitted to be collected from the customers of such districts upon an obligation on the part of the applicant utility to refund to them any and all amounts that are found to have been unlawfully collected.

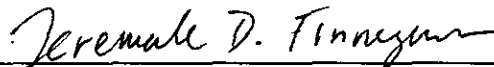
Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR CITY OF RIVERSIDE,
MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Application to Intervene by U.S. mail, postage prepaid addressed to the parties of record or their representatives as disclosed by the Commission's records in this proceeding.

Dated: September 13, 2000



Stuart W. Conrad