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LELAND B. CURTIS

November 22, 1999

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, MO 65101

RE: Missouri-American Water Company
Cause No. WR-2000-281 and SR-2000-282

FILED²
NOV 23 1999
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing is one original and fifteen copies of the Application of the City of St. Peters to Intervene Out of Time.

Please stamp "filed" on the extra copy and return the copy to me in the enclosed self-addressed stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Leland B. Curtis

Leland B. Curtis

LBC:tm
Enclosures

cc: Parties of Record

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

FILED²

NOV 23 1999

Missouri Public
Service Commission

In the Matter of Missouri-American Water)	
Company's Tariff Sheets Designed to Implement)	Case No.: WR-2000-281
a General Rate Increase for Water Service)	Tariff No.: 200000366
Provided to Customers in the Missouri Service)	
Area of the Company.)	
In the Matter of Missouri-American Water)	
Company's Tariff Sheets Designed to Implement)	Case No.: SR-2000-282
a General Rate Increase for Sewer Service)	Tariff No.: 200000367
Area of the Company.)	

**APPLICATION OF THE CITY OF ST. PETERS
TO INTERVENE OUT OF TIME**

Comes now the City of St. Peters, pursuant to 4CSR 240-2.060 and for its Application to Intervene states to the Commission:

1. The City of St. Peters, Missouri, is a fourth class municipality situated in St. Charles County, Missouri. The City Hall is located at 1 St. Peters Centre Boulevard, P. O. Box 9, St. Peters, Missouri 63376. The City and its residents receive water service from Missouri-American Water Company ("MAWC").

2. All communications and pleadings in this docket should be directed to:

Leland B. Curtis
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 726-8789 (Fax)

3. On October 15, 1999, Missouri-American Water Company submitted to the Commission proposed tariff sheets intended to implement a general rate increase for water and sewer service provided to customers in the Missouri service area of the Company. The

proposed tariffs bear a requested effective date of November 15, 1999. The proposed water service tariffs are designed to produce an annual increase of approximately 53.97 percent (\$16,446,277) in the Company's revenues.

4. On October 28, 1999, the Commission issued its Suspension Order and Notice and set a date for interested parties to intervene no later than November 17, 1999.

5. The City has been reviewing information regarding MAWC's proposed rate increase but due to City Council meeting schedules, the City was not able to consider its intervention action until after the intervention deadline.

6. The City seeks to intervene in this rate case proceeding because MAWC has proposed to allocate its general rate increase on a Single Tariff Pricing ("STP") basis. The City opposes the STP methodology and supports District Specific Pricing ("DSP").


7. The City's interests are different from those of the general public.

8. The City's Application to Intervene Out of Time should not prejudice any party.

WHEREFORE, the City of St. Peters, respectfully requests the Commission to grant its Application to Intervene Out of Time.

Respectfully submitted,

CURTIS, OETTING, HEINZ
GARRETT & SOULE, P.C.



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CERTIFICATE OF MAILING

A true and correct copy of the foregoing was mailed this 22nd day of November, 1999, by placing same in the U.S. Mail postage prepaid to: Dean L. Cooper/W.R. England, III, Brydon, Swearingen & England, P.C., 312 E. Capitol Avenue, P. O. Box 456, Jefferson City, Missouri 65102; Office of the Public Counsel, P. O. Box 7800, Jefferson City, Missouri 65102 and General Counsel, Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

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