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LELAND B. CURTIS

FILED

November 24, 1999

NOV 29 1999

Missouri Public  
Service Commission

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

Dear Mr. Roberts:

Enclosed for filing is one original and fifteen copies of the Application of St. Charles County 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

LBC:tm  
Enclosures

cc: Parties of Record

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

**FILED**

NOV 29 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 ST CHARLES COUNTY  
TO INTERVENE OUT OF TIME**

Comes now the County of St. Charles, pursuant to 4CSR 240-2.060 and for its Application to Intervene Out of Time states to the Commission:

1. St. Charles County is a First Class Charter county of the State of Missouri. The St. Charles County offices are located at 100 N. 3rd Street, St. Charles, Missouri 63301. The County 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 County has been reviewing information regarding MAWC's proposed rate increase but due to conflicting meeting schedules, the County was not able to consider its intervention action until after the intervention deadline.

6. The County 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 County opposes the STP methodology and supports District Specific Pricing ("DSP").

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

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

WHEREFORE, the County of St. Charles, 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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Attorneys for City of St. Charles County

### CERTIFICATE OF MAILING

A true and correct copy of the foregoing was mailed this 24<sup>th</sup> day of November, 1999, by placing same in the U.S. Mail postage prepaid to:

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Leland B. Curtis