

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

In the Matter of a Motion for an Emergency)
Order Establishing a Temporary Moratorium)
on Utility Discontinuances to Protect Public)
Health and Safety by Mitigating the Spread of)
the COVID-19 Pandemic)
Case No. AO-2021-0164

APPLICATION TO INTERVENE

COME NOW the Cities of St. Joseph, Missouri, and Jefferson City, Missouri (collectively, "the Cities"), by and through counsel, and file their Application to Intervene in this case pursuant to Section 386.420, RSMo and 20 CSR 4240-2.075. In support of this application, the Cities state as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri (MO) 64501.
2. The City of Jefferson (Jefferson City), Missouri, is a municipality of the State of Missouri located in Cole County. The principal business address for the City of Jefferson is: City Hall, John G. Christy Municipal Building, 320 E. McCarty, Jefferson City, Missouri (MO) 65101.
3. All communications and pleadings in this case should be served on:

William D. Steinmeier
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4. On December 7, 2020, Consumers Council of Missouri (CCM) filed a *Motion for an Emergency Order and Request for Expedited Treatment*, requesting that the Commission issue a statewide moratorium on the

involuntary disconnection or discontinuance of residential service by Commission-regulated electric, gas and water corporations through at least March 31, 2021.

5. On December 8, 2020, the Commission issued its *Order Directing Notice and Shortening Time for Responses* in this case, establishing December 14, 2020 as the deadline for responses to CCM's motion.
6. The Cities are large consumers of utility services supplied by Missouri-American Water Company, Evergy and Spire (St. Joseph), and Ameren (Jefferson City). As municipal governments, the Cities interact with those utilities in public works projects and otherwise. The Cities are also governmental bodies representing the residents and commercial interests of the Cities. The Cities also provide municipal sewer service and have contracts ("termination of water service agreements") with Missouri-American Water Company under which Missouri-American terminates water service to non-paying or delinquent sewer customers of the Cities, at the Cities' request. For each of these reasons, the Cities have an interest in this case which is different from that of the general public and which may be adversely affected by a final order arising out of this case. Granting the instant Application to Intervene would serve the public interest.
7. The Cities state that they are still reviewing the CCM Motion in this case, but will file a Response specifically addressing the issue of

termination of service to municipal sewer customers during any Commission-ordered moratorium.

WHEREFORE, the City of St. Joseph, Missouri and the City of Jefferson, Missouri, respectfully request that the Missouri Public Service Commission grant this Application to Intervene and make the Cities parties to this proceeding.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR THE
CITY OF ST. JOSEPH
AND THE
CITY OF JEFFERSON

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at staffcounsel@psc.mo.gov), on the Office of the Public Counsel (at opc@opc.mo.gov) and on all parties of record on this 14th day of December 2020.

/s/ William D. Steinmeier

William D. Steinmeier