

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Missouri-)
American Water Company for the approval of an) File No. WO-2023-0193
Agreement with the City of O’Fallon, Missouri to)
Sell and Deliver Water for Resale and a Related)
Tariff Sheet)

CITY OF O’FALLON’S MOTION TO INTERVENE

COMES NOW the City of O’Fallon, Missouri (“O’Fallon”), and respectfully submits its Motion to Intervene in this proceeding pursuant to 20 CSR 4240-2.075. In support of its Motion, O’Fallon states as follows:

1. O’Fallon is a Missouri Charter City located in St. Charles County. It has a population exceeding 90,000. O’Fallon provides water service to its residents and businesses.

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

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3. On or about December 12, 2022, Missouri-American Water Company filed an application seeking approval of an agreement with O’Fallon to sell and deliver water for resale and a related tariff sheet.

4. On December 13, 2022, the Commission issued its Order Directing Notice and Setting Intervention Deadline. The Commission set an intervention deadline of January 9, 2023.

5. O'Fallon seeks to intervene in this proceeding because the Commission's decision could affect O'Fallon's interests as the other party to the agreement that is the subject of this case, which are different than the interests of the general public. O'Fallon supports the application.

6. Granting O'Fallon's Motion to Intervene will also be in the public interest because O'Fallon will bring to this proceeding its expertise regarding the issues being considered and its experience as a water service provider.

WHEREFORE, O'Fallon respectfully requests that the Commission grant this Motion to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was emailed, faxed, or mailed by U.S. Mail, postage paid, this 6th day of January 2023, to the persons shown on the attached list.

/s/Carl J. Lumley

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