

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

In the Matter of Missouri-American Water Company’s)	
Request for Authority to Implement a General Rate)	<u>File Nos. WR-2015-0301</u>
Increase for Water and Sewer Service Provided in)	<u>and SR-2015-0302</u>
Missouri Service Areas)	

**MISSOURI DIVISION OF ENERGY’S
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development –
Division of Energy¹ (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075,
respectfully requests that the Missouri Public Service Commission (“Commission”) grant
intervention to DE in the above-styled matters. For its Motion to Intervene, DE states as
follows:

1. On July 31, 2015, Missouri-American Water Company (“MAWC”) filed with the Commission a revised tariff to implement a general rate increase.
2. On August 5, 2015, the Commission issued its *Order Suspending Tariff, Directing Notice, Setting Hearings and Directing Filings*, which set an intervention deadline of no later than August 25, 2015.
3. As stated in the Direct Testimony of MAWC President Mr. Kartmann, “The electric and water sectors are closely aligned: energy extraction and production require a significant amount of water, while the treatment and delivery of water and

¹ On August 29, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development”

wastewater services requires a significant amount of energy, representing about four percent of all U.S. energy consumption each year.”²

4. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

5. DE’s interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;³ consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.⁴ DE’s intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

6. DE expects to develop its positions on specific issues as this case proceeds.

7. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned counsel with a copy to

DEDEnergyCases@ded.mo.gov.

² Direct testimony of Mr. Frank Kartmann, p. 32, ll. 11-14.

³ §§ 640.676 and 640.150.2 RSMo.

⁴ § 640.150.1 RSMo.

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Alexander Antal

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 11th day of August, 2015.

/s/ Alexander Antal

Alexander Antal