

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

In the Matter of Missouri-American Water)	
Company's Request for Authority to Implement)	Case No. WR-2024-0320
General Rate Increase for Water and Sewer)	Case No. SR-2024-0321
Service Provided in Missouri Service Areas.)	

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075 and applies for intervention as a party to this case involving a proposed rate increases by Missouri-American Water Company (“Company” or “MAWC”).

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri. Consumers Council has participated in numerous rate cases at the Missouri Public Service Commission (“Commission”), including the previous MAWC general rate case, Case No. WR-2020-0344, et al.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. Consumers Council's interest in this matter relates to the way MAWC's request may affect the rates, terms and conditions of service for residential water and sewer customers, including low-income and low-use customers, as well as the health and safety of vulnerable customers. This interest is different and distinct from the general public interest.

4. Consumers Council is opposed to increases to the utility's revenue requirement if those increase are based on unjust or unreasonable actions. Consumers Council supports a thorough audit of a historical test year for the utility in this rate case. Consumers Council is generally opposed to unfair or discriminatory cost allocations (those allocations between customer classes, as well as those allocations between distinct and non-connected service areas). Consumers Council is also opposed to unreasonable residential rate design components.

Consumers Council wishes to become a party to this case, so that it may engage in discovery to further explore these issues with regard to the specific evidence in this matter. Consumers Council reserves the right to provide the Commission with its detailed positions in this case, following further review of the testimony, discovery responses, and other materials.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for Consumers Council of Missouri

Dated: July 16, 2024

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 16th day of July 2024.

/s/ John B. Coffman
