## **BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

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In the Matter of Missouri-American Water ) Company's Request for Authority to Implement General Rate Increase for Water and Sewer service

WR-2024-0320 SR-2024-0321

## **TRIUMPH FOODS, LLC'S APPLICATION FOR INTERVENTION**

Comes Now, Triumph Foods, LLC ("Triumph Foods") and submits its Application to Intervene pursuant to 20 CSR 4240-2.075(1)(2). In support of its application to intervene, Triumph Foods states the following:

1. Triumph Foods is a Missouri limited liability company with its principal place of business at 5302 Stockyards Expressway, St. Joseph, Missouri.

2. Triumph Foods owns and operates a large pork-processing facility in St. Joseph, Missouri and is the largest industrial consumer of water in Missouri-American Water Company's (MAWC) service territory. Triumph Foods employs thousands of people in production-related positions and hundreds in management and clerical positions.

3. Triumph Foods receives water service from MAWC under a special service agreement pursuant to MAWC's economic development rider. The special service agreement, and its amendments, have been approved by the Commission as being in the public interest in multiple previous MAWC rate cases.

4. Triumph Foods must be able to represent its own interests regarding the special service agreement and the issues in this proceeding. Because Triumph Foods' interest in the proceeding is different than the general public and cannot be adequately represented

by any other party, it should be granted intervention in this case. Further, Triumph Foods' intervention will aid the Commission and serve the public interest.

5. Correspondence and communication regarding this Application, including service

of all notices and orders of this Commission should be addressed to:

Joshua Harden Harden Law 14108 E. 223<sup>rd</sup> St. Peculiar, Missouri 64078 Telephone: 573-639-7613 e-mail: jktharden@gmail.com

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Joshua Kleinlein CFO, VP Finance & Accounting 5302 Stockyards Expressway St. Joseph, Missouri 64504 E-mail: JKleinlein@triumphfoods.com

6. Triumph is still reviewing MAWC's direct testimony and initial pleadings, and

does not have a position on MAWC's request at this time.

WHEREFORE, Triumph Foods, LLC requests that it be permitted to intervene as a party

in this proceeding.

Respectfully submitted,

/s/ Joshua Harden

Joshua Harden Mo 57941

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been e-mailed to all counsel of record this 17<sup>th</sup> day of July 2024.

## <u>/s/ Joshua Harden</u>