BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

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FILED

NOV 1 9 2009

In the Matter of Missouri-American Water Company's Request for Authority to Implement a General Rate Increase For Water and Sewer Service Provided in Missouri Service Areas

Missouri Public Service Commission

Case No. WR-2010-0131

VERIFIED APPLICATION OF ST. LOUIS AREA FIRE SPRINKER ASSOCIATION TO INTERVENE

Comes now, St. Louis Area Fire Sprinkler Association, an unincorporated association, by counsel and applies for permission to intervene in the above captioned case per the rules of this Commission. In support of its application the applicant states:

1. This case involves a request for a general rate increase.

2. Application is an unincorporated association of fire sprinkler businesses in Missouri. The

Applicant provides private commercial and residential fire sprinkler systems to customers of Missouri – American Water Company. The General Rate Increase requested in this case impacts detrimentally on members of the association and their customers . The proposed tariffs and rules of Missouri-American Water Company affects the safety of the public and the business relationships of the Applicant , are not reasonable and unreasonably discourages the public from protecting their homes with private fire sprinkler systems.

3. Those wishing to contact the Applicant may contact Mr. Stan Shiner, Chairman of the Government and Legislative Committee, St. Louis Area Fire Sprinkler Association, 4316 Bridgeton Industrial Drive, Bridgeton, Mo 63044, Telephone 314 486 3433, Fax 314 739 6401.

4. As an association the Applicant submits herewith a list of its membership (Exhibit 1) as it is required by the Commission's rules and regulations. (The members in Exhibit 1 are also the same members of the St. Louis Fire Sprinkler Alliance, a companion group.)

5. All correspondence communications, orders and decisions of the Commission herein should be sent to:

Terry C. Allen, Mo Bar 19894 Allen Law Offices, LLC 612 E. Capitol Ave., PO 1702 Jefferson City, Missouri 65102 Tele 573 636 9667 Fax 573 636 4667 terry@tcallenlawoffices.com

6. There are no pending actions or final unsatisfied judgments or decisions against the Applicant.

7. Applicant has no annual reports or assessments overdue.

8. Applicant seeks to intervene pursuant to 4 CSR 240-2.075

9. Applicant's interest is clearly different from those of MAWC, the general public, or any other party. Any final order of this Commission could affect the viability of the members of the Applicant, its right and ability to contract with the public to provide private fire sprinkler protection and prevent fire loss. At issue are metering, connections, standby, rental, or annual water meter fees for meters or service taps which are 2" or less that are in connection to or with any water service into residential structures throughout the entire state. There are other issues that may arise from these proceedings that may also impact of the Applicant and its members to which no party has any interest except the applicant.

10. No other party can adequately represent and protect the additional legitimate concerns of the Applicant and its members.

WHEREFORE, APPLICANT, St. Louis Area Fire Sprinkler Association, an unincorporated

association respectfully requests that the Commission grant its application to intervene.

Terry C. Allén Mo Bar No 19894 Allen Law Offices, LLC 612 E. Capitol Ave, PO 1702 Jefferson City, Missouri 65102 Fax 573 636 4667 Tele 573 636 9667 terry@tcallenlawoffices.com

ATTORNEY FOR APPLICANT

VERIFICATION

After being duly sworn, the affiant verifies that he of lawful age and from his own personal information, knowledge and belief states that the above facts are true.

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County of Cole)) ss State of Missouri)

SUBSCRIBED AND SWORN TO BEFORE ME BY TERRY C. ALLEN THIS THE $\frac{19^{10}}{100}$ of November , 2009.

GJ.

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"NOTARY SEAL
Judith L. Allen, Notary Public
Cole County, State of Missouri
My Commission Expires 3/11/2010
Commission Number 06394823

#### **CERTIFICATE OF SERVICE**

A copy of the foregoing was served by me on the parties of record through their attorneys' of record as the list appears in this case via e-mail, mail or facsimile on the <u>19</u> day of <u>NOU</u>, 2009.

Jory Cellen Terry C. Allen _____

* Welcome to St. Louis Fire Sprinkler Alliance



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- C Articles and News
- Sprinkler Saves
- -
- J Myths and Facts ⇒ Fire Services

CONTRACTOR MEMBERS

Accel Fire Protection Systems 4405 D Meramec Bottom Rd St. Louis, MO 63129

Accurate Fire Protection 1428 Gravois Road High Ridge, MO 63049

Advanced Fire Protection 24 High Trail St. Peters, MO 63376

Ahern Fire Protection 5555 West Park Ave. St. Louis, MO 63110

American Fire Sprinklers LLC P.O. Box 20127

St. Louis, MO 63123

Aqua Star Fire Protection, Inc. **1** 201 Dardenne Farms Dr. St. Charles, MO 63304

Automatic Fire Sprinkler P. O. Box 3637 Bloomington, IL 61702

 Bi-State Fire Protection Corporation
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 241 Hughes Lane
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 St. Charles, MO 63301
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Bover Fire Protection **O** 2425 Amann Drive Belleville, IL 62220

Century Fire Sprinkler O 11777 Lackland Rd. St. Louis, MO 63146

Convy Fire Protection P. O. Box 88 St. Charles, MO 63302

Diversified Automatic Sprinkler P.O. Box 305 Chesterfield, MO 63006

Engineered Fire Protection 1615 S. Kingshighway St. Louis, MO 63110

Fire Protection Systems, Inc. **0** 4316 Bridgeton Industrial Dr. Bridgeton, MO 63044 **(314) 845-7997** fax: (314) 845-6788 email:

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(314) 771-0033 fax: (314) 664-1619 email: <u>dcefpinc@swbefl.net</u>

(314) 739-1400 fax: (314) 739-6401 email:

Exhibitl PJ

# Welcome to St. Louis Fire Sprinkler Alliance

Fire Tech, LLC 0 1353 Baur Blvd. Suite 1901 St. Louis, MO 63132

**Gateway Fire Protection** 4860 Baumgartner Rd. St. Louis, MO 63129

**Grinnell Fire Protection** 3787 Rider Trail South Earth City, MO 63045

Guardian Fire Protection 1519 N. Broadway St. Louis, MO 63102

Kane Fire Protection 170 East Alton Avenue East Alton, IL 62024

L&K Fire Protection, Inc. P.O. Box 187 Marion, IL 62959

L. Grasse and Associates O 1940 S. Kingshighway St. Louis, MO 63110

**McDaniel Fire Systems Inc.** 2320 Millipark Drive Maryland Heights, MO 63043

National Fire Suppression 54 Worthington Maryland Heights, MD 63044

R. J. Neubert Sprinklers LLC 🛛 🍳 9070 Watson Road St. Louis, MO 63126

St. Louis Automatic Sprinkler 3928 Clayton Ave. St. Louis, MO 63110

Standard Fire Protection 1771 Buckingham Green Court St. Charles, MO 63303

**United Fire Protection Systems** 4084 Bingham Avenue St. Louis, MO 63116

Wayne Automatic Sprinkler 🏼 🍳 10720 Midwest Ind. Blvd. St. Louis, MO 63132

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(618) 254-0681 fax: (618) 254-1914 email:

(618) 993-3977 fax: (618) 993-2275 email:

(314) 771-3244 fax: (314) 771-3254 email:

(314) 426-9300 fax: (314) 426-9301 email:

(314) 542-4084 fax: (314) 542-4087 emali:

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# FABRICATION MEMBERS

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# Exhibit) P. Z