

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

<b>In the Matter of the General</b>	)	
<b>Rate Increase for Water and Sewer</b>	)	<b>Case No. WR-2008-0311</b>
<b>Provided by Missouri-American Water</b>	)	
<b>Company</b>	)	

**JOINT APPLICATION TO INTERVENE OF THE  
CITIES OF PARKVILLE, MISSOURI, LAKE WAUKOMIS, MISSOURI  
AND PARK UNIVERSITY**

Come now the CITY OF PARKVILLE, MISSOURI ("Parkville"), the CITY OF LAKE WAUKOMIS, MISSOURI ("Lake Waukomis") and PARK UNIVERSITY ("Park"), and pursuant to 4 C.S.R. 240-2.075 apply to intervene herein and become parties hereto with respect to the above matter and state as follows;

1. The City of Parkville ("Parkville") is a municipality located in Platte County and the City and its residents and businesses receive water from Missouri-American Water Company ("Missouri-American") through the Company's Parkville ("Platte County") District facility.

2. The City of Lake Waukomis ("Lake Waukomis") is a municipality located in Platte County and the City receives water for resale to its residents and businesses from Missouri-American through the Company's Parkville ("Platte County") District facility.

3. Park University ("Park") is a university located in Platte County and receives water for itself, its students, faculty and others on its campus from Missouri-American through the Company's Parkville ("Platte County") District facility.

4. Correspondence, communications, orders and decisions in this matter should be addressed to:

Jeremiah D. Finnegan, Esq.  
FINNEGAN, CONRAD & PETERSON, L.C.  
1209 Penntower Office Center  
3100 Broadway  
Kansas City, Missouri 64111

5. It has come to the attention of Parkville, Lake Waukomis, and Park, hereinafter sometimes jointly referred to as the "Platte County Intervenors" or "Applicants", that on or about March 31, 2008, Missouri-American filed proposed tariff sheets to implement a general rate increase for water and sewer service designed to produce an annual \$49.6 million in gross annual water revenues or a 26.4% increase over current water revenues. A portion of such increased revenues are to come from water customers in the Parkville District in which Parkville, Lake Waukomis and Park are located.

6. By Order dated April 3, 2008, the Commission set April 23, 2008 as the intervention deadline.

7. Applicants are generally and jointly opposed to an increase in water rates for the Platte County District unless justified as reasonable, lawful and non-discriminatory after notice and an opportunity to be heard.

8. The granting of the proposed interventions would serve the public interest.

9. Applicants Parkville and Lake Waukomis are political subdivisions of the State of Missouri representing, in addition to their own interests as water users, their respective residents and businesses. Park, in addition to representing its own interests as a water user also represents its students, faculty and others on its campus.

10. Applicants, who are being served solely by the company's Platte County district facilities, have an interest which is different from that of the general public, the remainder of the general public is served solely by the company's facilities in their respective districts and receive no water service from the Platte County district. Applicants may be adversely impacted by a final order arising from the case.

11. Applicant Parkville has been granted intervenor status in several prior Missouri-American rate cases and has been an active participant. Applicants Lake Waukomis and Park have also joined with and participated with Parkville in the Company's last rate case. Applicants are to be represented jointly by the same counsel and will present evidence by a jointly engaged consultant.

12. Granting the proposed intervention would serve the public interest. This application is not filed for the purposes of delay, and if the Commission should grant this application, neither the parties nor the Commission will be prejudiced since applicants agree to take the case as it stands.

13. Applicants assert that their intervention will be of assistance to the Commission in its deliberations on this subject and should be accepted in the interest of fairness and justice.

WHEREFORE, for the foregoing reasons, the City of Parkville, the City of Lake Waukomis and Park University respectfully request that the Commission grant their Application to Intervene in this matter and be made a party hereto with all rights to notice of and to participate in all proceedings and hearings, to present evidence, to cross-examine

witnesses, file briefs and participate in argument if any be held; and for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

s/ Jeremiah D. Finnegan  
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ATTORNEYS FOR INTERVENORS  
PARKVILLE, LAKE WAUKOMIS AND PARK  
UNIVERSITY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this 23rd day of April, 2008, served the foregoing Application to Intervene by electronic delivery to all parties of record.

s/ Jeremiah D. Finnegan  
Jeremiah D. Finnegan,  
Attorney for Intervenors