

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

In the Matter of Missouri-American)	<u>Case No. WR-2008-0311</u>
Water Company's Request for Authority)	consolidated with SR-2008-0312
to Implement a General Rate Increase)	Tariff Nos. YW-2008-0588, 0589,0591,
for Water Service Provided in Missouri)	0592, 0593 and 0594 and SR-2008-0595,
Service Areas)	0596 and 0597

APPLICATION TO INTERVENE OF CITY OF JOPLIN, MISSOURI

COMES NOW the City of Joplin, by and through counsel, pursuant to 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case, and in support of its Application to Intervene states as follows:

1. The City of Joplin (Joplin) is a municipality located in Jasper County, Missouri, and receives its water service from Missouri American Water Company (hereinafter MAWC). The City of Joplin also represents the interests of its citizens, who likewise receive their water service from MAWC.

2. Joplin's interest in proceedings affecting the rates for water service in the MAWC Joplin District has been previously recognized by the Missouri Public Service Commission, in permitting Joplin's intervention in prior MAWC rate-related proceedings.

3. On March 31, 2008, MAWC filed proposed tariffs reflecting an annual revenue increase of over \$49 million, an increase of 26.4% in revenues. Additionally, the proposed tariffs raise rates on Joplin ratepayers by over 32%, following a 64% rate increase just last year. These proposed tariffs, as they impact Joplin ratepayers, are unjust, unreasonable and unduly discriminatory, in violation of law.

4. On April 3, 2008, the Missouri Public Service Commission issued an Order suspending the proposed rates and tariffs and directing an investigation of the proposals, setting an

intervention deadline, scheduling a hearing, and setting a pre-hearing conference. This Application to Intervene is timely under that Order.

5. Joplin states, pursuant to 4 CSR 240-2.075(2), that it is opposed to any unreasonable or unjust increase in water rates that would create financial hardship or undue discrimination to its citizens and businesses, and to the City of Joplin itself.

6. The granting of the proposed intervention would serve the public interest.

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

Marc H. Ellinger
Jane A. Smith
Blitz, Bardgett & Deutsch, L.C.
308 East High Street, Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358

WHEREFORE, for the foregoing reasons, the Intervenor City of Joplin respectfully requests that the Commission grant this Application to Intervene in this matter.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By: 

Marc H. Ellinger, #40828
Jane A. Smith, #28681
308 East High Street
Suite 301
Jefferson City, MO 65101
Telephone No.: (573) 634-2500
Facsimile No.: (573) 634-3358

CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene were sent to each of the following persons via U.S. Mail, postage paid, on this 22nd day of April, 2008:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102-7800

Office of General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Dean Cooper
Brydon, Swearingen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456

Stuart W. Conrad
David L. Woodsmall
Finnegan, Conrad & Peterson, L.C.
1209 Penntower Office Center
3100 Broadway
Kansas City, MO 64111

James M. Fischer
Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

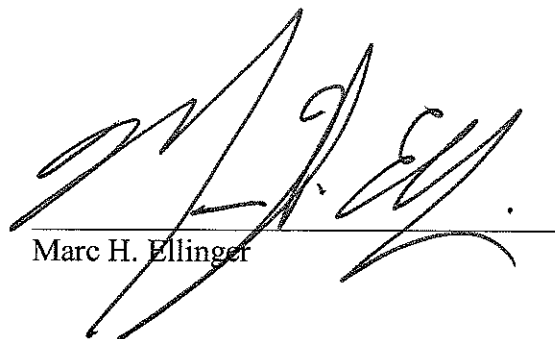
Nathan Nickolaus
City Counselor
City Hall
320 East McCarty Street
Jefferson City, MO 65101

Mark W. Comley
Newman, Comley & Ruth, P.C.
P.O. Box 537
Jefferson City, MO 65102-0537

Diana M. Vuylsteke
Bryan Cave, LLP
211 North Broadway, Suite 3600
St. Louis, MO 63102

Lisa C. Langeneckert
The Stolar Partnership LLP
911 Washington Avenue
St. Louis, MO 63101-1290

Sherrie A. Schroder
Michael A. Evans
Hammond, Shinnars, Turcotte,
Larrew and Young, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, MO 63105



Marc H. Ellinger