BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

| In the Matter of Missouri-American |) | |
|--|---|-----------------------|
| Water Company's Request for Authority |) | |
| To Implement a General Rate Increase |) | Case No. WR-2007-0216 |
| For Water Service Provided in Missouri |) | |
| Service Areas | ĺ | |

APPLICATION TO INTERVENE OF THE MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital and SSM HealthCare (collectively known as the "Missouri Energy Group" and hereinafter referred to as "Applicants" or "MEG"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. The MEG is an ad hoc group of not-for-profit hospital systems located within the state of Missouri that have purchased substantial amounts of water from Missouri-American Water Company ("MAWC") and have actively participated in previous cases involving MAWC and its predecessor, St. Louis County Water Company, before this Commission.

2. As large-use customers, the rates and terms and conditions of the water

service of Applicants may be substantially and uniquely affected by the outcome of this

case. MEG's interests in this matter cannot be adequately represented by any other party.

3. It is the position of these Applicants that revenue requirements should be

determined on the basis of total cost of service and that rates for each class should be

determined using an appropriate classification and allocation of those costs. Parties

traditionally involved in water cases have differing views on the appropriate level of

costs, the treatment of costs, their causative factors, the cost allocation methodology to be

used, and the intra-class rate design. It is only with a reasoned analysis of all parties'

methods that all of the parties' interests can be adequately represented.

4. Granting intervention by Applicants in this case will serve the public

interest by assisting the Commission in developing a more complete record for its

decision; and

5. Correspondence or communications regarding this application, including

service of all notices and orders of this Commission shall be addressed to:

Lisa C. Langeneckert, Esq.

The Stolar Partnership LLP

911 Washington Avenue, #700

St. Louis, MO 63101-1290

<u>llangeneckert@stolarlaw.com</u>

WHEREFORE, having stated the grounds for intervention and the position and

interest of the Applicants in these proceedings, Applicants ask that the Commission grant

07000457.DOC 2

this Application to Intervene and thereby entitle said Applicants to participate fully in this proceeding.

Respectfully submitted,

THE STOLAR PARTNERSHIP LLP

Lisa C. Langeneckert #49781
911 Washington Avenue
St. Louis, MO 63101-1290
314 641-5158 (Direct Dial)
314 641-8158 (Direct FAX)
llangeneckert@stolarlaw.com

Attorneys for the Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this 12th day of January, 2007 caused a copy of the foregoing to be served on all persons on the official service list in Case No. WR-2007-0216.

Lisa C. Langeneckert