

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

In the Matter of Missouri-American) **Case No. WR-2007-0216**
Water Company's Request for Authority) **Tariff File Nos.** YW-2007-0407,
to Implement a General Rate Increase) YW-2007-0409, YW-2007-0410,
for Water Service Provided in Missouri) YW-2007-0411, YW-2007-0412 and
Service Areas.) YW-2007-0413

APPLICATION TO INTERVENE

COMES NOW the City of St. Joseph, Missouri (hereinafter referred to as "St. Joseph"), by and through counsel, and files its Application to Intervene in this case pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

Lisa Robertson
City Attorney
City Hall, Room 307
1100 Frederick Avenue
St. Joseph, MO 64501
Phone: 816-271-4680
Facsimile: 816-271-4683
E-mail: lrobertson@ci.st-joseph.mo.us

and

William D. Steinmeier
Mary Ann (Garr) Young
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive, P.O. Box 104595
Jefferson City, MO 65110-4595
Phone: 573-659-8672
Facsimile: 573-636-2305
Email: wds@wdspsc.com
Myoung0654@aol.com

3. On December 15, 2006, Missouri-American Water Company submitted proposed tariff sheets to the Missouri Public Service Commission designed to implement a substantial general rate increase for water service provided to customers in the Missouri service territories of the Company, including St. Joseph. On January 3, 2007 the Commission issued its *Suspension Order and Notice, Order Setting Hearings, and Order Directing Filing* in this case, directing that interested parties wishing to intervene must do so on or before January 16, 2007. This Application to Intervene is, therefore, timely filed.
4. Pursuant to 4 CSR 240-2.075 (4), St. Joseph states that as a large consumer of water supplied by Missouri-American, and as a governmental body representing the residents and commercial interests of the City of St. Joseph, St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising from this case. Granting the instant Application to Intervene would also serve the public interest.
5. St. Joseph desires to participate fully in this proceeding.
6. Pursuant to 4 CSR 240-2.075 (2), St. Joseph states that it is currently unsure of the specific position(s) it will take in this matter.

WHEREFORE, the City of St. Joseph, Missouri, respectfully requests that the Missouri Public Service Commission grant this Application to Intervene in this matter and make St. Joseph a party to this proceeding for all purposes.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier, MoBar #25689
Mary Ann (Garr) Young, MoBar #27951
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive
P.O. Box 104595
Jefferson City, MO 65110-4595
Phone: 573-659-8672
Fax: 573-636-2305
Email: wds@wdspc.com

COUNSEL FOR THE CITY OF ST.
JOSEPH, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), the Office of Public Counsel (at opcservice@ded.mo.gov), and counsel shown below, on this 16th day of January 2007.

/s/ William D. Steinmeier

William D. Steinmeier

Dean L. Cooper
Brydon, Swearngen & England, PC
P.O. Box 456
Jefferson City, MO 65102-0456
dcooper@brydonlaw.com
For Aquila, Inc.

William R. England, III
Brydon, Swearngen & England, PC
P.O. Box 456
Jefferson City, MO 65102-0456
trip@brydonlaw.com
For Aquila, Inc.

Stuart M. Conrad
Finnegan, Conrad & Peterson, L.C.
3100 Broadway, Suite 1209
Kansas City, MO 64111
Stucon@fcplaw.com
For AG Processing, Inc.

Lisa C. Langeneckert
The Stolar Partnership LLP
911 Washington Avenue
St. Louis, MO 63101-1290
llangeneckert@stolarlaw.com
For the Missouri Energy Group

Leland B. Curtis
Carl J. Lumley
Curtis, Heinz, Garrett & O'Keefe, PC
130 S. Bemiston, Suite 200
Clayton, MO 63105
lcurtis@lawfirmemail.com
clumley@lawfirmemail.com
For City of Warrensburg

Marc H. Ellinger
Jane A. Smith
Blitz, Bardgett & Deutsch, LC
308 East High Street
Suite 301
Jefferson City, MO 65101
For City of Joplin

Sherrie A. Schroder
Michael A. Evans
Hammond, Shinnars, Turcotte,
Larrew & Young, PC
7730 Carondelet Avenue
Suite 200
St. Louis, MO 63105
saschroder@hstly.com
mevans@hstly.com
For Utility Workers Union of America