

JAN 10 2007

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

**Missouri Public
Service Commission**

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

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 December 15, 2006, MAWC filed proposed tariffs reflecting an annual revenue increase of over \$41 million, an increase of 91% in rates. These proposed tariffs may be unjust, unreasonable and unduly discriminatory, in violation of law.

4. On January 3, 2007, 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: 

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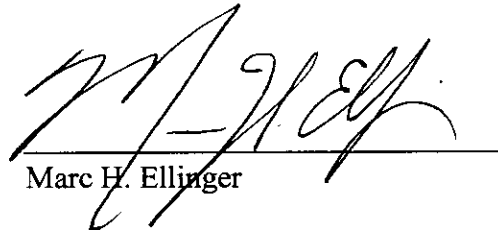
CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene were sent to each of the following persons by postage paid U.S. Mail, this 10th day of January, 2006:

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

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