BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Request of Liberty Utilities)	
(Missouri Water) LLC d/b/a Liberty)	File No. WR-2024-0104
for Authority to Implement a General Rate)	File No. SR-2024-0105
Increase for Water and Wastewater Service)	
Provided in its Missouri Service Areas)	

APPLICATION TO INTERVENE BY THE CITY OF BOLIVAR, MISSOURI

COMES NOW, the City of Bolivar ("Bolivar"), Missouri, by and through counsel, pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 2420-2.075, and files its Application to Intervene in the above referenced cases. In support thereof, Bolivar states as follows:

- 1. On March 13, 2024, Liberty Utilities (Missouri Water) Corp. d/b/a Liberty ("Liberty") filed proposed tariff sheets to increase its annual revenues by a total of an additional \$7,990,089 in annual water revenues and an additional \$75,178 in annual sewer revenues. The proposed annual water revenues are an increase of approximately 130.37%. The proposed annual sewer revenues are an increase of approximately 2.2%. Liberty is also proposing to consolidate its rates into two sets of water rates, and two sets of wastewater rates, which would be consolidated from its existing fifteen water tariff rate areas and five wastewater tariff rate areas. The tariff sheets have a proposed effective date of April 12.
- 2. On March 15, 2024, the Commission issued its Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule, which set an intervention deadline of April 4, 2024.

3. Correspondence, communications, orders, and the decision in this matter should be addressed to:

Donald M. Brown Douglas, Haun & Heidemann, P.C. 103 E. Broadway PO Box 117 Bolivar, Missouri 65613

Telephone: (417) 887-4949 (Springfield) / (417) 326-5261 (Bolivar)

Facsimile: (417) 326-2845

Email: donald@dhhlawfirm.com

Terry M. Jarrett
Peggy A. Whipple
Healy Law Offices, LLC
306 Monroe St.
Jefferson City, MO 65101
Phone: (573) 415-8379
Phone: (417)864-7018
Phone: (417)864-7018

Facsimile: (417) 864-7018 Facsimile: (417) 864-7018 Email: terry@healylawoffices.com Email: peggy@healylawoffices.com

4. Bolivar has a franchise agreement with Liberty, and Liberty provides water and wastewater services to all residential, commercial and industrial customers within the city limits of Bolivar, as well as to Bolivar.

- 5. Bolivar's interest is different than those of the general public, and may be adversely affected by final orders from the Commission in these cases. Bolivar wishes to ensure that both it and its citizens' interest in affordable and reliable water and wastewater services are preserved for the future, that Bolivar has the ability to appropriately plan for the future, and that Bolivar is not disadvantaged or otherwise economically disadvantaged by Liberty's current requests. Such interests are not currently represented at this time.
- 6. Bolivar expects to develop its position on specific issues as these cases develop, and takes no position on the filings at this time.

7. Granting intervention to Bolivar would serve the public interest by allowing Bolivar to examine the issues that are significant from a policy and public interest standpoint and from their unique perspective.

WHEREFORE, Bolivar prays that this Commission issue an order granting its application to intervene in these proceedings and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

Donald M. Brown, #

Douglas, Haun & Heidemann, P.C.

103 E. Broadway

PO Box 117

Bolivar, Missouri 65613

Telephone: (417) 887-4949 (Springfield)

(417) 326-5261 (Bolivar)

Facsimile: (417) 326-2845

Email: donald@dhhlawfirm.com

Terry M. Jarrett, #45663 Healy Law Offices, LLC 306 Monroe Street Jefferson City, MO 65101

Telephone: (573) 415-8379 Facsimile: (417) 864-7018

E-mail: terry@healylawoffices.com

Peggy A. Whipple, #54758 Healy Law Offices, LLC 3010 E. Battlefield, Suite A Springfield, MO 65804 Telephone: (417) 864-7018

Telephone: (417) 864-7018 Facsimile: (417) 864-7018

Email: peggy@healylawoffices.com

ATTORNEYS FOR CITY OF BOLIVAR

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 4th day of April, 2024.

Donald M. Brown