

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

In the Matter of Missouri-American Water	)	
Company's Request for Authority to Implement	)	Case No. WR-2026-0304
General Rate Increase for Water and Sewer	)	Case No. SR-2026-0305
Service Provided in Missouri Service Areas.	)	

OPPOSITION TO MIEC'S MOTION TO INTERVENE

COMES NOW Missouri-American Water Company (MAWC or Company), by and through counsel, and for its *Opposition to the Application to Intervene* filed herein by the Missouri Industrial Energy Consumers ("MIEC"), for its failure to comply with the Commission's rules, states as follows:

1. On July 15, 2026, the Missouri Industrial Energy Consumers ("MIEC"), timely¹ filed its *Application to Intervene (Application)* in these cases.²

2. In its *Application*, MIEC states that it is applying for intervention pursuant to Commission Rule 20 CSR 4240-2.075.

3. MIEC did not state in its *Application* whether or not it is an incorporated association. However, examination of the public records of the Missouri Secretary of State shows that it is a nonprofit domestic corporation in a state of administrative dissolution.

4. Section 355.711.3, RSMo, provides "[a] corporation administratively dissolved continues its corporate existence but may not carry on any activities except those

¹ In its ***Order Directing Notice Of Contested Case, Establishing An Intervention Deadline, Directing A Proposed Procedural Schedule, Suspending Tariff Sheets, Delegating Authority, And Directing Responses***, issued on July 2, 2026, the Commission set July 17 as the deadline for intervention applications.

² Although a ***Motion to Consolidate*** these rate cases was filed by the Company on July 1, it has not yet been ruled.

necessary to wind up and liquidate its affairs [.]”

5. Intervention in these cases by MIEC is not necessary for winding up and liquidating its affairs.

6. With respect to its *Application* in these cases, MIEC is not acting as an incorporated association, but as an unincorporated association, because it is acting outside of and beyond its statutory authority.

7. Commission Rule 20 CSR 4240-2.075, at subsection (2), describes the required contents of an application to intervene, including: “(D) If any applicant is an association, other than an incorporated association or other entity created by statute, a list of all of its members[.]”

8. MIEC did not file with its *Application* a list of all its members as required by Commission Rule 20 CSR 4240-2.075(2)(D).

9. Rule 20 CSR 4240-2.075(4) provides, “If the commission grants intervention to an association, other than an incorporated association or other entity created by statute, the commission is not granting intervention to the “association,” but is granting intervention to the individual members of the association.” It follows that each member of MIEC must be treated as a separate party.

WHEREFORE, because MIEC is acting outside and beyond its statutory authority and because MIEC has not complied with Commission Rule 20 CSR 4240-2.075(2)(D) by filing a list of all its members, MAWC respectfully requests the Commission issue its order denying MIEC’s *Application to Intervene* or, in the alternative, requiring MIEC to file a list of its members in compliance with the Commission rule; and granting such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was sent by electronic mail to all parties of record this 20th day of July, 2026.

/s/ Kevin A. Thompson