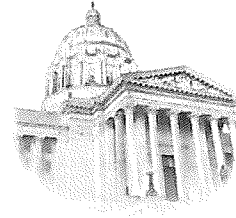


John B. Coffman, LLC
Attorney at Law



871 Tuxedo Blvd.
(573) 424-6779 St. Louis, MO 63119 john@johncoffman.net

July 15, 2011

VIA EMAIL

Ms. Nancy Bowser
Secretary of the Rate Commission
Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, MO 63103

Re: Application to Intervene of AARP

Dear Ms. Bowser:

Enclosed for filing is an electronic copy of the Application to Intervene of AARP. It is my understanding that, at a recent meeting, the Rate Commission determined that email service is sufficient. I have endeavored to include on my email anyone that needs to be on the service list or that would like to be copied.

If anyone at MSD or any party desires hard copies of this filing, I will be more than happy to provide them.

Please call me if you have any questions. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "John B. Coffman".

John B. Coffman

cc: MSD & Parties of Record

**BEFORE THE RATE COMMISSION OF THE
METROPOLITAN ST. LOUIS SEWER DISTRICT**

METROPOLITAN ST. LOUIS SEWER DISTRICT)
Proposed Wastewater Rate Increase FY2013-FY2016.)

APPLICATION TO INTERVENE OF AARP

COMES NOW **AARP**, by and through counsel, pursuant to Subsection 3(4) of the Operational Rules, Regulations and Procedures of the Rate Commission, and Section 2 of the July 8, 2011 Revised Procedural Schedule, and hereby applies for intervention in the currently pending matter involving the Wastewater Rate Change Proposal submitted to the Rate Commission by the Staff of the Metropolitan St. Louis Sewer District (“MSD”) on May 10, 2011.

In support of this application, AARP states as follows:

1. AARP¹ is a nonprofit, nonpartisan organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole. Advocacy for reasonable utility rates and service for older persons is one of AARP’s

¹ In 1999, the “American Association of Retired Persons” changed its name to simply “AARP”, in recognition of the fact that people do not have to be retired to become members. AARP is a non-profit corporation that has been granted tax exempt status under Section 501(c)(4) of the Internal Revenue Code as a social welfare organization.

priority issues. AARP's interest in this matter relates to how the proposed wastewater rate increase may burden MSD customers who are 50 years of age and older.

2. AARP is aware that the date set for applications to intervene was May 31, 2011; however, there is good cause to permit AARP's intervention and participation in this matter at this time. AARP does not plan to submit prepared expert testimony in this matter; but it believes that the public interest would be served by its intervention and participation in this matter. AARP has a history of constructive intervention and participation before public utility commissions throughout the country, assisting in the development of a competent and substantial factual record in numerous cases.

No party will be prejudiced by AARP's intervention at this point in the procedural schedule. AARP agrees to accept the record and procedural schedule as established up to this date, and will submit to reasonable discovery. AARP further agrees to abide by the Rate Commission's Operational Rules and to accept service by mail or by electronic means.

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

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

WHEREFORE, AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to formally participate in this proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "John B. Coffman". The signature is written in a cursive style with a large initial "J" and "C".

John B. Coffman MBE #36591

John B. Coffman, LLC

871 Tuxedo Blvd.

St. Louis, MO 63119-2044

Ph: (573) 424-6779

E-mail: john@johncoffman.net

Attorney for AARP

Dated: this 15th day of July, 2011.