

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE for Authority to File Tariffs Increasing)	<u>Case No. ER-2007-0002</u>
Rates for Electric Service Provided to Customers)	Tariff No. YE-2007-0007
In the Company's Missouri Service Area.)	

APPLICATION TO INTERVENE BY AARP

COMES NOW the AARP, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated Union Electric Company d/b/a AmerenUE ("AmerenUE") when it filed new proposed tariff sheets on July 10, 2006, requesting an additional rate increase of approximately \$360 million annually.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership 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.¹ AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

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 be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues.

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

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

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
Ph: (512) 480-2426
E-mail: jbriesemeister@aarp.org

2. On July 11, 2006, the Commission issued an Order directing interested parties wishing to intervene to do so by July 31, 2006, and thus, this application is timely.

3. AARP has a long track record of professional participation before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on issues regarding rates and services for older utility consumers.

4. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for AmerenUE's residential electric customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and adversely impact those Missouri seniors who are receiving electric service from AmerenUE. This interest is different than the general public interest. Seniors are particularly vulnerable to increases in energy prices. Seniors also devote a higher percentage of their total spending than do other age groups on residential energy costs. Seniors also have special needs with regard to access to electric service.

5. AARP is concerned by the enormous size of the electric rate increase proposed in AmerenUE's July 11, 2006 filing, especially in light of recent information suggesting that AmerenUE's rates are actually producing overearnings. AARP has already been granted intervention by the Commission in the ongoing formal investigation into AmerenUE's rates (Case No. EO-2006-0430) on May 31, 2006.

6. AARP is opposed to an unjust and unreasonable revenue requirement or a discriminatory rate design for AmerenUE's residential customers, and after further investigation, plans to provide the Commission with a more detailed position on the proposals and testimony submitted in this case. Accordingly, AARP believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

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

Respectfully submitted,

/s/ John B. Coffman

John B. Coffman MBE #36591
Attorney at Law
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

Attorney for AARP

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 29th day of July 2006:

General Counsel's Office
Missouri Public Service Commission
P O Box 360
Jefferson City MO 65102

James B. Lowery
Smith Lewis, LLP
111 S. Ninth St., Suite 200
P.O. Box 918
Columbia, MO 65201

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

Steven R. Sullivan
General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
