

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

In Re: Union Electric Company's 2011	)	
Utility Resource Filing Pursuant to	)	Case No. EO-2011-0271
4 CSR 240-Chapter 22	)	

**APPLICATION TO INTERVENE OF THE  
MISSOURI JOINT MUNICIPAL ELECTRICAL UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electrical Utility Commission ("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

1. On February 23, 2011, Union Electric Company d/b/a Ameren Missouri filed a motion asking the Commission to open a case in which the company filed its 2011 Integrated Resource Plan.

2. On February 24, 2011, the Commission issued an Order setting a deadline of March 15, 2011 for applications to intervene in this matter.

3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Fifty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

4. MJMEUC serves multiple municipalities that currently have wholesale power contracts with Ameren Missouri and 14 municipalities directly embedded in Ameren

Missouri's transmission system that take transmission service through the Midwest Independent System Operator ("MISO").

5. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electrical systems that take transmission through MISO and municipal electrical systems that have wholesale power contracts with Ameren Missouri. Such interest is not currently represented in the proceedings.

6. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be part of the Integrated Resource Planning process.

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

Respectfully Submitted,

By: /s/Douglas L. Healy

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**ATTORNEYS FOR MJMEUC**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing application to intervene was served by mailing a copy to all listed parties of record by 1<sup>st</sup> class U.S. Mail this 15<sup>th</sup> day of March, 2011, as well as by filing a copy electronically in the Commission's EFIS database.

/s/Douglas L. Healy

Douglas L. Healy