BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Kansas City Power & Light Company for Approval to Make Certain Changes in its Charges for Electric Service to Implement its Regulatory Plan

Case No. ER-2010-0355

AMERENUE'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or

"Company"), pursuant to 4 C.S.R. 240-2.075, and for its Application for Intervention in this case, states as follows:

1. AmerenUE is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). There is already on file with the Commission a certified copy of the Company's Restated Articles of Incorporation (*see*, Commission Case. No. EO-96-431), a Certificate of Corporate Good Standing (*see*, Commission Case No. EF-2003-0514), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (*see*, Commission Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Thomas M. Byrne Managing Associate General Counsel Ameren Services Company 1901 Chouteau Ave. P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 tbyrne@ameren.com and

James B. Lowery Smith Lewis, LLP 111 South Ninth Street, Suite 200 P.O. Box 918 Columbia, MO 65205-0918 <u>lowery@smithlewis.com</u>

3. AmerenUE has an interest in this case that is different from that of the general public and which may be adversely affected by a final order arising from this case. Moreover, AmerenUE's intervention is in the public interest. AmerenUE's interest in this case arises from its status as only one of three investor-owned electric utilities regulated by the Commission in the state with a direct and specific interest in the issues raised in this case, including the Commission's treatment of various revenue and expense items and, in particular, the Commission's examination of Kansas City Power & Light Company's ("KCPL") inclusion in rate base of its share of the new Iatan 2 Plant.

4. At this time, AmerenUE is unable to state its position relating to the relief sought by KCPL and is unsure of the positions it may take on the issues.

WHEREFORE, AmerenUE respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

SMITH LEWIS, LLP

<u>/s/ James B. Lowery</u>

James B. Lowery, #40503 111 South Ninth Street, Suite 200 P.O. Box 918 Columbia, MO 65205-0918 (573) 443-3141 (573) 442-6686 (fax) <u>lowery@smithlewis.com</u>

Thomas M. Byrne, Mo. Bar No. 33340 Managing Associate General Counsel Ameren Services Company 1901 Chouteau Avenue (MC 1310) St. Louis, MO 63103 P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 (314) 554-2514 (314) 554-4014 (fax) tbyrne@ameren.com

Attorneys for AmerenUE

Dated: June 16, 2010

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing AmerenUE's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 16th day of June, 2010, on:

Staff of the Missouri Public Service Commission Governor Office Building PO Box 360 Jefferson City, MO 65102 gencounsel@psc.mo.gov

Office of the Public Counsel Governor Office Building 200 Madison Street, Suite 650 Jefferson City, MO 65102 opcservice@ded.mo.gov

James M. Fischer Larry W. Dority Fischer & Dority P.C. Kansas City Power & Light Company 101 Madison Street, Suite 400 Jefferson City, MO 65101 jfischerpc@aol.com lwdority@sprintmail.com

Roger Steiner Sonnenschien Nath & Rosenthal, LLP 4520 Main Street Suite 1100 Kansas City, MO 64111 rsteiner@sonnenschein.com

William G. Riggins Curtis Blanc Kansas City Power & Light Company 1200 Main Kansas City, MO 64105 <u>Bill.riggins@kcpl.com</u> <u>Curtis.blanc@kcpl.com</u>

/s/ James B. Lowery

James B. Lowery