BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company,) d/b/a Ameren Missouri's Tariff to Increase) Its Annual Revenues for Electric Service)

File No. ER-2012-0166

<u>APPLICATION TO INTERVENE BY THE</u> <u>MISSOURI RETAILERS ASSOCIATION</u>

COMES NOW the Missouri Retailers Association (hereinafter "Missouri Retailers" or "MRA"), by and through counsel, pursuant to Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case.

In support of this Application, the Missouri Retailers state as follows:

1. The MRA is a not-for-profit association dedicated to serving the needs of retailers

and grocers and their distribution facilities statewide. MRA has several members who are served by AmerenUE and who rely on dependable electric service at reasonable rates in order to survive in the current economy, in order to employ their workforce, and to continue to provide their products and services at reasonable prices. A list of MRA members is attached as Exhibit A. This interest is different than the general public interest.

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

Thomas R. Schwarz, Jr. Stephanie S. Bell Blitz, Bardgett & Deutsch, L.C. 308 East High Street Suite 301 Jefferson City, MO 65101 Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358 E-mail: <u>tschwarz@blitzbardgett.com</u> E-mail: <u>sbell@blitzbardgett.com</u>

And

David Overfelt, President Missouri Retailers Association P.O. Box 1336 Jefferson City, MO 65102 Telephone No.: (573) 636-5128 E-mail: <u>dave@moretailers.com</u>

3. On February 6, 2012, this Commission issued an Order directing interested parties wishing to intervene to do so by February 23, 2012, and thus this Application is timely.

4. MRA is opposed to any unjust and unreasonable rate for its members served by AmerenUE's electric service. After further investigation, MRA plans to provide the Commission with a more detailed position on AmerenUE proposals and testimony submitted in this case.

5. MRA 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 MRA respectfully requests that the Commission grant its Application

to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

Thomas R. Schwarz, Jr., #29645

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene by the Missouri Retailers Association were sent to each of the following parties of record via electronic transmission this 21 st day of February, 2012:

General Counsel's Office E-mail: GenCounsel@psc.mo.gov

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MRA MEMBERS

ABBCO Service Corporation Accu-Care, Inc. Aldi Alticor, Inc. d/b/a Amway Corporation Altria Client Services, Inc. Arch Amenities, Inc. dba Good Feet Store Best Buy Co., Inc. Big V Super Market BKC, Inc. dba Schottzies Bar & Grill Branson Concrete Forming, Inc. dba Ogden Concrete Buch Mufflers, Inc. dba Midas Auto Service Experts et al **Busch's Florist Centraz Industries CVS** Pharmacy D.E. Enterprises, Inc. dba St. Louis Staffing Demac Equipment Corporation Dierberg Markets, Inc **Direct Selling Association Eldon Furniture** Ellis Furniture Co. Ferrel's Card Shops, Inc. Ferry Funeral Home Foster Brothers Wood Products Habcare, Inc. Home Depot, The HRW Inc. dba Williams Residential Care I & II J. F. Roling & Son, Inc. Jefferson City Oil Co., Inc. Jennings Premium Meats Jerry Haas Race Cars Inc. Kallmeyer Brothers Ent., Inc. KEW Properties dba Sub Shop, Inc. Kirksville Anesthesia Association Kohl's Department Stores, Inc. Lift for Life Academy, Inc. Lift for Life Gym, Inc. Liston Enterprises, Inc. dba Seamus McDaniels Lowell Manufacturing Company Lowe's Companies, Inc. Macy's Midwest Mary Kay, Inc.

McClain Restaurant Group Meierotto's Jewelry, L.P. Metroplex Management LLC Missouri Baptist Children's Home Modern Auto Co., Inc. Noranda Aluminum Northstar Battery Co., LLC Old Town Donuts Patrick Furniture Mart Progressive Balloons, Inc. QuikTrip Corporation R.J. Reynolds Red Shed, The Retail Equation, Inc., The Retail Grocers Assn. Of Greater K.C. Rinehart's Farms, LLC Schnuck Markets, Inc. Schulte's Fresh Foods Sears Holdings Corporation Shepherd Care Inc dba Continuum LLC **Target Stores** Tri-Lakes Newspaper, Inc. dba Branson Tri-Lake News USO of Missouri, Inc. Village Bar Inc., The Walgreen Co. Women's Safe House (The)