

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

|                                              |                       |
|----------------------------------------------|-----------------------|
| In the Matter of the Consideration of )      |                       |
| Adoption of the PURPA Section 111(d)(13) )   |                       |
| Fossil Fuel Generation Efficiency Standard ) | Case No. EO-2006-0495 |
| as Required by Section 1251 of )             |                       |
| the Energy Policy Act of 2005 )              |                       |

**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:

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and

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3. As an electric utility, 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. In particular, AmerenUE could be directly affected by the Commission's decision respecting whether or not to adopt the fuel generation efficiency standard that is the subject of this case. Moreover, AmerenUE's participation in this case will serve the public interest because it will afford AmerenUE the opportunity to provide the Commission with useful and relevant information relating to the issues in this case as the Commission deliberates with respect to whether to adopt the subject standard.

4. At this time, AmerenUE is unable to state its position on the issues presented in this case.

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

**/s/ James B. Lowery**

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**Attorneys for AmerenUE**

Dated: July 24, 2006

### **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 24th day of July, 2006, on:

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**/s/ James B. Lowery**  
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