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 Rates for Electric Service) Provided to Customers in the Company's) Missouri Service Area)

Case No. ER-2010-0036

<u>APPLICATION TO INTERVENE OF THE</u> <u>MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION</u>

COMES NOW, the Missouri Joint Municipal Electric 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 July 24, 2009, Union Electric Company d/b/a AmerenUE filed revised tariff sheets designed to increase AmerenUE's gross revenue.

2. On July 27, 2009, the Commission issued an Order allowing proper persons to file Applications to Intervene within 20 days.

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. Communications in regard to this Application should be addressed to:

Douglas L. Healy Healy & Healy, LLC 939 Boonville, Suite A Springfield, MO 65802 dhealy@mpua.org

4. MJMEUC serves 4 municipalities that currently have wholesale power contracts with AmerenUE and 14 municipalities directly embedded in AmerenUE'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 contract with AmerenUE. Such interest is not currently represented in the proceedings.

6. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC to represent those cities and members of the public which receive power from AmerenUE or which are dependent upon AmerenUE for transmission services. 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: <u>/s/ Douglas L. Healy</u> Douglas L. Healy Missouri Bar No. 51630 Healy & Healy, LLC 939 Boonville, Suite A Springfield, Missouri 65802 Telephone: (417) 864-8800 Facsimile: (417) 869-6811 Email: dhealy@mpua.org

ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene was served by mailing a copy to the following interested persons on this 17th day of August, 2009:

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> /s/ Douglas L. Healy DOUGLAS L. HEALY