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

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In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.

File No. ER-2016-0156

#### AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) pursuant to 4 CSR 240-2.075, and for its Application for Intervention in this case, states as follows:

1. Ameren Missouri 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 Articles of Incorporation (See Commission Case. No. EA-87-105), a Certificate of Corporate Good Standing (See Case No. EA-2015-0273), and a copy of the Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See Case No. EN-2011-0069), 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 the undersigned counsel as well as to:

Thomas Byrne Senior Director, Regulatory Affairs Ameren Missouri 1901 Chouteau Avenue (MC 1450) St. Louis, MO 63103 amerenmoservice@ameren.com 3. Ameren Missouri'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. The outcome of issues in this case may have an impact upon similar issues as they arise in the Company's future cases, including future rate cases, or issues important to Ameren Missouri could come up in this case but not in one of Ameren Missouri's own rate cases. Ameren Missouri also has an interest in this case that is different from that of the general public and that interest may be adversely affected by a final order arising from this case which no other party, including KCP&L Greater Missouri Operations Company, is required to protect since not all electric utilities always have the same interests. Moreover, Ameren Missouri's intervention is in the public interest as it can aid the Commission in addressing the policy implications of issues.

4. Ameren Missouri is generally supportive of the relief requested by KCP&L Greater Missouri Operations Company and on the issues in this case.

WHEREFORE, Ameren Missouri 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.

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Respectfully Submitted,

UNION ELECTRIC COMPANY d/b/a Ameren Missouri

### /s/ Wendy K. Tatro

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## ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

Dated: March 15, 2016

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 16<sup>th</sup> day of March, 2016.

<u>/s/ Wendy K. Tatro</u> Wendy K. Tatro