

**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)	<u>Case No. ER-2007-0002</u>
Tariffs Increasing Rates for Electric)	<u>Tariff No. YE-2007-00007</u>
Service Provided to Consumers in the)	
Company's Missouri Service Area)	

**APPLICATION OF THE UE JOINT BARGAINING COMMITTEE FOR LEAVE
TO INTERVENE OUT OF TIME**

COMES NOW the UE Joint Bargaining Committee (hereinafter referred to as the 'Committee') and, pursuant to 4 CSR 240-2.075, makes them this application for leave to intervene out of time (hereinafter referred to as the 'Application') in the above styled case. In support of this Application, the Committee states as follows:

1. The UE Joint Bargaining Committee is a nonpartisan group of associated labor unions that represent the health, welfare and safety interests of the men and women who work for AmerenUE. The Committee consists of the International Brotherhood of Electrical Workers (IBEW) Local 2, IBEW Local 309, IBEW Local 649, IBEW Local 702, IBEW Local 1439, IBEW Local 1455 and Operating Engineers Union Local 148.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Matthew Uhrig
LAKE LAW FIRM, LLC
3401 W. Truman Blvd.
Jefferson City, MO 65109
Ph: (573) 761-4790
E-mail: muhrig_lakelaw@earthlink.net

And to

Mike Datillo
IBEW Local 1455
5570 Fyler Avenue
St. Louis, MO 63139
Ph: (314) 351-6300
E-mail: local1455@sbcglobal.net

3. The Committee's interest is different than that of the general public and that interest may be adversely affected by any final order arising from this case.

4. The Committee's interest in this matter relates to the impact of AmerenUE's proposed rates on their members and the impact tariffed rules for the provision of service may have on the health, welfare or safety of AmerenUE employees. The Committee wishes to review, respond to and comment on any issues raised by AmerenUE's proposed tariff's.

5. Despite being late with this Application, the Committee has acted with good faith in the making of this Application and can show good cause as to why this Application is filed untimely. Due to the recent storms in St. Louis, which disrupted electric service and required members of the Committee's governing board to work longer than normal hours repairing electric lines, restoring electric service and other related duties, the Committee was unable to meet and confer about this rate case and obtain the necessary approval to intervene from its members.

6. The Committee notes that the PSC, upon a showing of good cause, may grant this Application. The PSC rules, however, do not define good

cause and, with that in mind, the Committee adopts the Commercial Group's position that Missouri Courts generally view the term to be remedial in nature, so as to avoid manifest injustice. See Application of the Commercial Group for Leave to Intervene Out of Time.

7. If granted the right to intervene, the Committee agrees that it would take the case as it now stands and therefore, no party would be prejudiced by such intervention.

8. The denial of the Committee's application to intervene would result in manifest injustice to its members and, more specifically, the AmerenUE employees they represent, because it would deny the Committee the opportunity to review, respond to or comment on AmerenUE's cost of service proposals, which directly or indirectly affect the health, welfare and safety of those employees.

9. The Committee is unsure at this time whether it will oppose or support AmerenUE's rate-increase request. However, after further investigation and discovery, the Committee plans to inform the Commission of its position in this case. The Committee, if granted intervention, would reserve the right to conduct discovery and submit testimony, pursuant to the scheduling order.

WHEREFORE, the UE Joint Bargaining Committee respectfully requests that this Application for Leave to Intervene Out of Time be granted and that it be provided full rights to participate immediately as a party to this proceeding.

Date: August 31, 2006

Respectfully Submitted,

/s/ Matthew Uhrig

Matthew Uhrig, Mo. Bar No. 49750

LAKE LAW FIRM, LLC

3401 W. Truman Blvd.

Jefferson City, MO 65109

(573) 761-4790

Fax: (573) 761-4220

E-mail: muhrig_lakelaw@earthlink.net

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail to the following parties on the 31st day of August, 2006.

Office of the General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101
gencounsel@psc.mo.gov

Paul A. Boudreau
Russell Mitten
Aquila Networks
312 East Capitol Avenue
PO Box 456
Jefferson City, MO 65102
PaulB@brydonlaw.com
Rmitten@brydonlaw.com

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65101
opcservice@ded.mo.gov

John B. Coffman
Consumers Council of Mo
AARP
871 Tuxedo Blvd.
St. Louis, MO 63119
john@johncomffman.net

Joseph P. Bindbeutel
Todd Iveson
Missouri Department of Natural Resources
8th Floor, Broadway Building
PO Box 899
Jefferson City, MO 65102
joe.bindbeutel@ago.mo.gov
todd.iveson@ago.mo.gov

Michael C. Pendergast
Laclede Gas Company
720 Olive Street, Ste 1520
St. Louis, MO 63101
mpendergast@lacledegas.com

Lisa C. Langeneckert
Missouri Energy Group
911 Washington Avenue, 7th Floor
St. Louis, MO 63101
llangeneckert@stolarlaw.com

Gaylin Rich Carver
Mo. Asst. for Social Welfare
3225-A Emerald Lane
PO Box 6670
Jefferson City, MO 65102
carver@gptlaw.com

Stuart Conrad
Noranda Aluminum, Inc.
3100 Broadway, Suite 1209
Kansas City, MO 64111
stucon@fcplaw.com

Diana M. Vuylsteke
Mo. Industrial Consumers
211 N. Broadway, Suite 3600
St. Louis, MO 65102
dmvuylsteke@bryancave.com

Douglas Micheel
State of Missouri
PO Box 899
Jefferson City, MO 65102
douglas.micheel@ago.mo.gov

Koriambanya S. Carew
The Commercial Group
2400 Pershing Road, Suite 500
Crown Center
Kansas City, MO 64108
carew@bscr-law.com

H. Lyle Champagne
MOKAN, CCAC
906 Olive, Suite 1110
St. Louis, MO 63101
lyell@champagneLaw.com

Rick D. Chamberlain
The Commercial Group
6 NE 63rd Street, Suite 400
Oklahoma City, OK 73105
Rdc_law@swbell.net

/s/ Matthew Uhrig
Matthew Uhrig