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

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In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri, to the Iowa Border and Associated Substation Near Kirksville, Missouri

EA-2015-0146

## APPLICATION TO INTERVENE OUT OF TIME OF MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now the Missouri Industrial Energy Consumers ("MIEC") and, pursuant to 4 C.S.R. 240-2.075 and the Commission's June 2, 2015 *Order and Notice,* and pursuant to subsection (10), files its application to intervene out of time. For its application, the MIEC states as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers.

2. As large industrial customers, the MIEC's interest is different than that of the general public and may be affected by a final order arising from these cases.

3. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

4. The MIEC's intervention will serve the public interest by assisting the Commission's record for decision in these cases.

5. The deadline for timely intervention was June 22, 2015. The MIEC missed that deadline because, among other things, counsel was participating in the trial in ER-2014-0370 and related actions and meetings and co-counsel was on vacation. This case is at an early stage and no substantive filings have been made in the record since June 22; therefore no party will be prejudiced by MIEC's intervention. The MIEC will accept the record as it stands in this case.

WHEREFORE, the MIEC requests that it be permitted to intervene out of time and be

made a party to this case for all purposes.

Respectfully submitted

## BRYAN CAVE, LLP

By: <u>/s/ Edward F. Downey</u>

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Attorneys for the Missouri Industrial Energy Consumers

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 8th day of July, 2015, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey