

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

In re: Union Electric Company's 2014)	
Utility Resource Filing Pursuant to)	File No. EO-2015-0084
4 CSR 240 – Chapter 22)	

**APPLICATION TO INTERVENE
OF UNITED FOR MISSOURI**

COMES NOW United For Missouri, Inc. ("UFM"), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, respectfully applies to intervene as a party in the above referenced case. In support of this Application, UFM states as follows:

1. On October 1, 2014, Union Electric Company, d/b/a Ameren Missouri, filed its Integrated Resource Plan, including its Preferred Resource Plan with the Missouri Public Service Commission ("Commission").

2. On October 1, the Commission issued an *Order Directing Notice and Setting Date for Submission of Intervention Requests*, which set an intervention date of October 21.

3. UFM is a nonprofit Mutual Benefit corporation organized under the laws of the state of Missouri. Formed in July 2010, UFM has more than 76,000 members, primarily residents of the state of Missouri. UFM is committed to serving its members and the public in educating them about and supporting economic policies in the state that will foster economic growth, opportunity and prosperity. UFM and its members are committed to the principles expressed in article I, section 2 of the Missouri Constitution, which declares,

that all persons have a natural right to life, liberty, the pursuit of happiness and the enjoyment of the gains of their own industry; that all persons are created equal and are entitled to equal rights and opportunity under the law; that to give security to these things

is the principal office of government, and that when government does not confer this security, it fails in its chief design.

2. UFM's interest is in supporting governmental policies that provide "equal rights and opportunity under the law" and that foster a strong economy. Excessive and unnecessary regulation diminishes opportunity. Electric rates made higher by excessive regulation also diminish opportunity. This interest is different than the interest of the general public. UFM believes that its intervention and participation in this proceeding would serve the public interest in that it will provide the Commission with UFM's free market perspective and improve the Commission's record for decision. UFM seeks to become a party to this case for all purposes.

3. UFM generally supports Ameren Missouri's Preferred Resource Plan, but more importantly, UFM opposes any acceleration of its Preferred Resource Plan due to imposition of the so called "Clean Power Plan," which is an unnecessary and unwarranted usurpation of this Commission's authority by the Environmental Protection Agency. However, UFM reserves the right to modify its position in response to specific evidence presented in the case.

4. Correspondence, communications, orders and the decisions in this matter should be addressed to:

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WHEREFORE, UFM respectfully requests the Commission grant it intervention in this case.

Respectfully submitted,

/s/ David C. Linton

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Certificate of Service

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 13th day of October, 2014, to all individuals on the Commission's service list.

/s/ David C. Linton