

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

In the Matter of the Cancellation of the Certificate of)
Convenience and Necessity Originally Approved in) Case No. ED-2019-0309
File No. EA-2005-0180 and the LTS Rate Schedule)

**APPLICATION TO INTERVENE OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”), and pursuant to 4 CSR 240-2.075 and this Commission's April 12, 2019, *Order Directing Notice, Establishing Time to Intervene, and Directing Staff Recommendation*, applies to intervene in Case No. ED-2019-0309. In support of its application to intervene, MIEC states the following.

1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of Ameren Missouri ("Ameren").

2. As a representative of the interests of large industrial customers of Ameren, the MIEC’s interest is different than that of the general public and may be adversely affected by actions taken as a result of filings and decisions in this case.

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 this case.

5. No party will be prejudiced by MIEC’s intervention.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER, LLP

By: /s/ Lewis Mills

Lewis R. Mills, #35275
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
Telephone: (573) 556-6627
Facsimile: (573) 556-7447
E-mail: lewis.mills@bclplaw.com

Diana M. Vuylsteke, # 42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2543
Facsimile: (314) 259-2020
E-mail: dmvuylsteke@bclplaw.com

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 2nd day of May, 2019, to all parties on the Commission's service list in this case.

/s/ Lewis Mills