

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

In re: Union Electric Company's Change to its)
2011 Utility Resource Filing Pursuant to) File No. EO-2012-0127
4 CSR 240 – Chapter 22.)

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

Comes now Anheuser-Busch Companies, Inc., BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Metal Container Corporation, Monsanto, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Enbridge Ozark Pipeline Company, Saint Gobain, and Solutia (referred to herein as the Missouri Industrial Energy Consumers or "MIEC") and, pursuant to 4 C.S.R. 240-2.075 and the Commission's November 10, 2011 *Order Directing Notice and Establishing Time to Respond* in this case, file their application to intervene. For their application, the MIEC states as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri").
2. As large industrial customers of Ameren Missouri, the interests of the MIEC is different than that of the general public and may be adversely affected by a final order arising from this case.
3. The MIEC does not yet have a position on the issues in this case and reserve the right to take positions on specific issues as this case proceeds.
4. Intervention by the MIEC will serve the public interest by assisting the Commission's record for decision in this case.

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, LLP

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 21st day of November, 2011, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke