

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE's for Authority to File Tariffs)	
Increasing Rates for Electric Service Provided to)	Case No. ER-2010-0036
Customers in the Company's Missouri Service)	
Area.)	

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (hereinafter "Consumers Council" or "CCM"), by and through counsel, pursuant to Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated by Union Electric Company d/b/a AmerenUE ("AmerenUE") when it filed new proposed tariff sheets on July 24, 2009, requesting an additional rate increase of approximately \$ 401 million annually as well as a 1.67% interim rate increase.

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit membership organization that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council is a member of the Consumer Federation of America. Hundreds of Consumers Council members are captive residential customers of AmerenUE's monopoly electric service. The Consumers Council's main office is located within AmerenUE's Missouri electric service territory at 2510 Sutton Blvd., St. Louis, Missouri 63143-2116. Its website can be accessed at www.moconsumers.org.

Correspondence, communications, orders and the decision in this matter should be addressed to:

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

2. On July 27, 2009, this Commission issued an Order directing interested parties wishing to intervene to do so by August 17, 2009, and thus, this application is timely.

3. Consumers Council has been an active party to several previous Commission cases, as was its successor organization, the Utility Consumers Council of Missouri. Consumers Council's interest in this matter relates to the proposed rates, terms and conditions of service for AmerenUE's residential electric customers and this interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for AmerenUE's residential electric customers. Consumers Council is also opposed to AmerenUE's request for an interim rate increase in this case. After further investigation, Consumers Council plans to provide the Commission with a more detailed position on AmerenUE proposals and testimony submitted in this case.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, the Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

John B. Coffman MBE #36591
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

Attorney for the Consumers Council of Missouri

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 9th day of August 2009:

General Counsel's Office
Missouri Public Service Commission
P O Box 360
Jefferson City MO 65102

James B. Lowery
Smith Lewis, LLP
111 S. Ninth St., Suite 200
P.O. Box 918
Columbia, MO 65205

Thomas M. Byrne
Managing Associate General Counsel
Ameren Services Company
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102-2230

Steven R. Sullivan
General Counsel
Ameren Services Company
P.O. Box 66149 (MC 1300)
St. Louis, MO 63166-6149

/s/ John B. Coffman
