

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

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

No. EA-2017-0345

**VERIFIED APPLICATION TO INTERVENE
OF LOCAL UNION NO. 2, INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, AFL-CIO**

COMES NOW, International Brotherhood of Electrical Workers Local 2, AFL-CIO (“Local 2”), by and through its counsel, pursuant to 4 CSR 240-2.075, and respectfully applies to intervene as a party in this proceeding, and in support of this Application, states:

1. This matter involves the Applicant’s intention to construct and operate 96 miles of electric transmission line in the Missouri counties of Marion, Lewis, Knox, Adair and Schuyler, albeit for interstate use.
2. Local 2, International Brotherhood of Electrical Workers (“Union”) whose main office is located at 2131 59th St., St. Louis, Mo 63110, is a labor organization that represents a large number of non-managerial, construction and maintenance electrical employees across Missouri. Its jurisdiction covers all or part of Marion, Lewis, Knox, Adair and Schuyler Counties in Missouri.
3. The Union is an unincorporated association. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, the

Union does not have evidence of any such registration. The Union may be contacted at the address and telephone number listed here:

David Heidbreder
Business Manager
IBEW Local 2
2131 59th Street
St. Louis, MO 63110
(314) 645-2236
dheidbreder@ibew2.org

4. Though the Union is an “association,” it does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) is directed. It does not appear to be the intent of those regulatory subsections for the Union to file a list of all of its members, and the Union hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that the Union must comply with the subsection, the required list will be tendered immediately.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Patrick K. Shinnars
Schuchat, Cook & Werner
1221 Locust Street, Ste. 250
St. Louis, MO 63103
(314) 621-2626 (Telephone)
(314) 621-2378 (Fax)
pks@schuchatcw.com (email)

6. The Union does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. The Union does not have any annual reports or assessment fees that are overdue.

8. The Union seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representatives of non-managerial, non-professional electrical employees across Missouri, the Union and the employees it represents have interests in this proceeding which are clearly different from those of the Applicant, the general public, or any other party. The Union anticipates that their members either as employees of Ameren or employees of contractors would help comprise the workforce used to construct portions of this project. Additionally, Union members live and work in counties where the proposed transmission line will be built. These separate interests could be adversely affected by a final order arising from the case.

10. Based on the present information available, the Union supports the Applicant's intentions to construct and operate the transmission line.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of the Union and the employees it represents here.

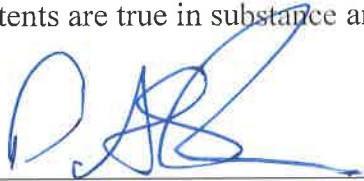
WHEREFORE, the Union respectfully asks the Commission to grant this application and to permit the Union to intervene here.

Respectfully submitted,

/s/ Patrick K. Shinnors
PATRICK K. SHINNERS
SCHUCHAT, COOK & WERNER
1221 Locust Street, Ste. 250
St. Louis, MO 63103
(314) 621-2626 (Telephone)
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pks@schuchatew.com
Attorney for IBEW, Local 2

State of MISSOURI)
) SS
County of ST. LOUIS CITY)

I, Patrick K. Shinnors, first being duly sworn upon my oath, depose and state that I am one of the attorneys for IBEW Local 2, that I have read the above and foregoing Verified Petition to Intervene and know the contents thereof; and that said contents are true in substance and in fact.



Patrick K. Shinnors

Subscribed and sworn to before me
this 6th day of October, 2017.

Regina MCGREW
Notary Public

REGINA MCGREW
Notary Public - Notary Seal
STATE OF MISSOURI
My Commission Expires Oct. 12, 2019
Commission #11253636

My Commission Expires: 10/12/19

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 6th day of October, 2017 to the persons on the Commission's service list in this case.

s/s Patrick K. Shinnors
Attorney for IBEW, Local Union
No. 2