

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariffs to Increase Its Annual)	<u>Case No. ER-2008-0318</u>
Revenues for Electric Service.)	Tariff Nos. YE-2008-0605

APPLICATION TO INTERVENE BY AARP

COMES NOW the AARP, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated Union Electric Company d/b/a AmerenUE ("AmerenUE") when it filed new proposed tariff sheets on April 4, 2008, requesting an additional rate increase of approximately \$251 million annually.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.¹ AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

¹ In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of its priority issues.

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

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2. On April 7, 2008, this Commission issued an Order directing interested parties wishing to intervene to do so by April 28, 2008, and thus, this application is timely.

3. AARP has a history of professional participation before this Commission and before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP testimony and advocacy has assisted commissioners in crafting just and reasonable decisions on several issues regarding rates and services for older utility consumers.

4. AARP's interest in this matter relates to the proposed rates, terms and conditions of service for AmerenUE's residential electric customers. More specifically, AARP's interest in this matter relates to how these proposals may directly and

adversely impact those Missouri seniors who are receiving electric service from AmerenUE. This interest is different than the general public interest. Seniors are particularly vulnerable to increases in energy prices. Seniors also devote a higher percentage of their total spending than do other age groups on residential energy costs. Many seniors also have special needs and safety concerns with regard to their access to electric service.

5. AARP is generally opposed to an unjust and unreasonable revenue requirement or any discriminatory rate design for AmerenUE's residential customers. After further investigation, AARP may provide the Commission with a more detailed position on the testimony and proposals that have been submitted in this case. Accordingly, AARP 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 AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 26th day of April 2008:

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