

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of an Investigation of Union)	
Electric Company d/b/a AmerenUE's Storm)	Case No. EO-2007-0037
Restoration Efforts in the St. Louis Area.)	

CITY OF FERGUSON, MISSOURI'S
APPLICATION TO INTERVENE

COMES NOW the City of Ferguson, Missouri (Ferguson), pursuant to 4 CSR 240-2.075 and for its Application to Intervene states to the Commission:

1. The City of Ferguson is a municipal corporation located in St. Louis County, Missouri, and organized and existing under the laws of the State of Missouri as a constitutional charter city.
2. All communications and pleadings in this case should be directed to:

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3. On or about July 26, 2006, the Commission issued an Order directing Staff to conduct a formal investigation of Union Electric Company d/b/a AmerenUE and any other regulated utilities activities having an impact on storm restoration efforts, including but not limited to AT&T and Missouri American Water Company, concerning the effectiveness of its storm preparation and restoration efforts in Eastern Missouri, which case was assigned Case No. EO-2007-0037, and which Order set an intervention deadline of August 7, 2006.

4. Ferguson seeks to intervene in this proceeding because the results of the investigation will affect Ferguson's interests as a municipality located in St. Louis County, Missouri, serving the public and individual residents of Ferguson.

5. Ferguson's interests as a constitutional charter city are different from those of the general public. Furthermore, Ferguson's intervention in this proceeding is in the public interest because of Ferguson's expertise in serving the public and the residents of the City of Ferguson.

6. Ferguson supports the Commission investigation in this proceeding.

7. There is good cause to grant this intervention, which was filed one day late. Due to vacation, counsel for Ferguson was not aware of the intervention deadline until August 6, 2006 and was not able to communicate with Ferguson and obtain authorization to file until after 5:00 PM on August 7, 2006 and was not able to make arrangements for electronic filing until the morning of August 8, 2006.

WHEREFORE, the City of Ferguson, Missouri, respectfully requests the Commission to issue its order granting Ferguson's Application to Intervene.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was emailed to the parties listed below on this 8th day of August, 2006.

/s/ Carl J. Lumley

Carl J. Lumley

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