

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust its)
Revenues for Natural Gas Service.) **File No. GR-2021-0241**

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075, and respectfully applies for intervention as a party in this natural gas rate case, initiated by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”). In support of this application, Consumers Council states as follows:

1. Consumers Council is a nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission, including previous Ameren Missouri rate cases.

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

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3. Consumers Council's interest in this matter relates to the rates, terms and conditions of service for the Company's residential natural gas customers, including low-income and vulnerable customers. 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 Company's residential natural gas customers. The issues in this matter has drawn our attention, and the organization desires the opportunity to conduct discovery in this matter. Consumers Council reserves the right to provide the Commission with more detailed positions in this rate case, following further review.

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

Respectfully submitted,

Dated: April 19, 2021

/s/ John B. Coffman

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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 all parties listed on the official service list on this 19th day of April 2021.

/s/ John B. Coffman
