

Post Office Box 1336  
Jefferson City, MO 65102



(573) 636-5128  
Fax (573) 636-6846

October 12, 2006

Ms. Colleen Dale  
Secretary and Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

FILED<sup>3</sup>

OCT 12 2006

Missouri Public  
Service Commission

RE: Union Electric Company d/b/a AmerenUE  
Case Nos: GR-2007-0003

Dear Ms. Dale:

Accompanying this letter for filing in the above referenced matters are the original and eight (8) copies of the Missouri Retailers Association's Late Filed Application to Intervene in the pending gas rate case for Union Electric.

If you have any questions please do not hesitate to contact me. Thank you for your assistance with this filing.

Sincerely,

  
Samuel E. Overfelt  
Attorney

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Enc.

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

**FILED<sup>3</sup>**

OCT 12 2006

Missouri Public  
Service Commission

In the Matter of Union Electric Company     )  
d/b/a AmerenUE for Authority to File        )  
Tariffs Increasing Rates for Gas Service     )     Case No. GR-2007-0003  
Provided to Customers in the Company's     )  
Missouri Service Area.                        )

**Missouri Retailers Association's Late Filed  
Application to Intervene**

Comes Now the Missouri Retailers Association (MRA) and pursuant to 4 C.S.R. 240.2-070 of the Missouri Public Service Commission's Rules of Practice and Procedure, the MRA hereby files its Late Filed Application to intervene in the above-referenced matter. In support of its Application, MRA respectfully states as follows:

1.     On July 7, 2006 Union Electric Company d/b/a AmerenUE (hereinafter UE) filed tariffs designed to increase its electric and gas rates by approximately \$360.7 million. The MRA is composed of retailers who represent a cross section of businesses within the State of Missouri. The MRA was organized in 1933 by court order in the Circuit Court of the City of St. Louis, with a present office in Jefferson City, Missouri. Over a period of many years MRA has purchased substantial amounts of gas and electric energy from UE and other utility companies in the State of Missouri.
  
2.     The matters to be considered in this case and the Commission's determinations thereon could have a direct significant impact on MRA's cost of energy service and

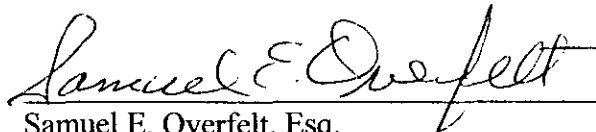
the manner in which it is supplied. Therefore, granting this proposed intervention to the MRA would serve the public interest.

3. It is MRA's position that their interests may be adversely affected by the transactions proposed herein. As large and small user customers of UE, the MRA has a direct and immediate interest in these proceedings that is different from that of the general public. *Also, in the event the Missouri Public Service Commission does not combine the Union Electric tariffs for gas energy and electric services, the MRA would not be able to participate in the formal proceedings on GR-2007-0003 of the Missouri Public Service Commission.*
4. Good cause exists for granting this late filed application inasmuch as MRA was unable to determine whether or not it should intervene in this rate case proceeding prior to the initial intervention deadline. MRA is filing this intervention request as soon as possible after the decision to intervene.
5. Granting MRA's requested late filed intervention would serve the public interest.
6. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Samuel E. Overfelt, Esq.  
Law Office of Samuel E. Overfelt  
618 East Capitol Avenue  
P.O. Box 1336  
Jefferson City, MO 65102

WHEREFORE, having stated the grounds for intervention and the position and interest of the MRA in these proceedings, the MRA ask that the Commission grant this Late Filed Application to Intervene, and thereby entitle MRA to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Samuel E. Overfelt", written over a horizontal line.

Samuel E. Overfelt, Esq.  
Law Office of Samuel E. Overfelt  
Missouri Bar Number 16386  
618 East Capitol Avenue  
P.O. Box 1336  
Jefferson City, MO 65102  
(573) 636-5128 (phone)  
(573) 636-6846 (fax)  
[moretailers@aol.com](mailto:moretailers@aol.com)

Attorney for Missouri Retailers Association

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7<sup>th</sup> day of September, 2006, a copy of the original of the foregoing was served via first class U.S. mail, postage prepaid, on the following parties of record:

Lewis R. Mills, Jr.  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 2230  
Jefferson City, MO 65102  
[Lewis.mills@ded.mo.gov](mailto:Lewis.mills@ded.mo.gov)

Steven R. Sullivan  
AmerenUE  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1300)  
St. Louis, MO 63166-6149  
[srsullivan@ameren.com](mailto:srsullivan@ameren.com)

Matthew B. Uhrig  
U.E. Joint Bargaining Committee  
3401 W. Truman  
Jefferson City, MO 65109  
[muhrig\\_lakelaw@earthlink.net](mailto:muhrig_lakelaw@earthlink.net)

Thomas M. Byrne  
AmerenUE  
1901 Chouteau Avenue  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)

Steve Dottheim  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Steve.Dottheim@psc.mo.gov](mailto:Steve.Dottheim@psc.mo.gov)

Paul A. Boudreau  
Aquila Networks  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102  
[PaulB@brydonlaw.com](mailto:PaulB@brydonlaw.com)

John Coffman  
AARP and  
Consumers Council of Missouri  
871 Tuxedo Blvd  
St. Louis, MO 63119  
[john@johncoffman.net](mailto:john@johncoffman.net)

Russell L. Mitten  
Aquila Networks  
312 E. Capitol Ave  
P.O. Box 456  
Jefferson City, MO 65102  
[rmitten@brydonlaw.com](mailto:rmitten@brydonlaw.com)

James B. Lowery  
AmerenUE  
111 South Ninth St., Suite 200  
P.O. Box 918  
Columbia, MO 65202-0918  
[lowery@smithlewis.com](mailto:lowery@smithlewis.com)

Michael C. Pendergast  
Laclede Gas Company  
720 Olive Street, Suite 1520  
St. Louis, MO 63101  
[mpendergast@lacledegas.com](mailto:mpendergast@lacledegas.com)

Rick E. Zucker  
Laclede Gas Company  
720 Olive Street  
St. Louis, MO 63101  
[rzucker@lacledegas.com](mailto:rzucker@lacledegas.com)

Gaylin Rich Carver  
Missouri Association for Social Welfare  
3225-A Emerald Lane  
Jefferson City, MO 65102-6670  
[carver@gptlaw.net](mailto:carver@gptlaw.net)

Joseph P. Bindbeutel  
MO Department of Natural Resources  
8th Floor, Broadway Building  
P.O. Box 899  
Jefferson City, MO 65102  
[joc.bindbeutel@ago.mo.gov](mailto:joc.bindbeutel@ago.mo.gov)

Lisa C. Langeneckert  
Missouri Energy Group  
911 Washington Ave., 7th Floor  
St. Louis, MO 63101  
[llangeneckert@stolarlaw.com](mailto:llangeneckert@stolarlaw.com)

Diana M. Vuylsteke  
Missouri Industrial Energy Consumers  
211 N. Broadway, Suite 3600  
St. Louis, MO 63102  
[dmvuylsteke@bryancavc.com](mailto:dmvuylsteke@bryancavc.com)

Lyell H. Champagne  
MOKAN, CCAC  
906 Olive, Suite 1110  
St. Louis, MO 63101  
[lyell@champagneLaw.com](mailto:lyell@champagneLaw.com)


Stuart Conrad  
Noranda Aluminum, Inc.  
3100 Broadway, Suite 1209  
Kansas City, MO 64111  
[stucon@fcplaw.com](mailto:stucon@fcplaw.com)

Koriambanya S. Carew  
The Commercial Group  
2400 Pershing Road, Suite 500  
Crown Center  
Kansas City, MO 64108  
[carew@bscr-law.com](mailto:carew@bscr-law.com)

Rick D. Chamberlain  
The Commercial Group  
6 NE 63rd Street, Ste. 400  
Oklahoma City, OK 73105  
[rdc\\_law@swbell.net](mailto:rdc_law@swbell.net)

Douglas E. Micheel  
MO Attorney General's Office *and*  
MO Department of Economic Development  
P.O. Box 899  
Jefferson City, MO 65102  
[douglas.micheel@ago.mo.gov](mailto:douglas.micheel@ago.mo.gov)

Todd H. Iveson  
MO Department of Natural Resources  
8th Floor, Broadway Building  
P.O. Box 899  
Jefferson City, MO 65102  
[todd.iveson@ago.mo.gov](mailto:todd.iveson@ago.mo.gov)

  
Samuel E. Overfelt, Esq.