

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

In the Matter Union Electric Company d/b/a	)	
Ameren Missouri's Tariff Filing to Implement	)	Case No. ET-2012-0011
Changes to Its Electric Energy Efficiency	)	
Programs	)	

**APPLICATION TO INTERVENE OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Anheuser-Busch, BioKyowa, Boeing, Doe Run, Enbridge, General Motors, GKN Aerospace, JW Aluminum, MEMC Electronic Materials, Metal Container Corporation, Monsanto, National Starch, Nestlé Purina, Noranda Aluminum, Procter & Gamble Company, and Saint Gobain (referred to herein as the Missouri Industrial Energy Consumers or "MIEC") and, pursuant to 4 C.S.R. 240-2.075 and the Commission's October 26, 2011 *Notice of Tariff Filing and Order Establishing Time to File Recommendations* in this case, file their application to intervene. For their application, the MIEC states as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri").
2. As large industrial customers of Ameren Missouri, the interests of the MIEC in the electric energy efficiency programs are different than that of the general public and may be adversely affected by a final order arising from this case.
3. The MIEC does not yet have a position on the issues in this case and reserve the right to take positions on specific issues as this case proceeds.
4. Intervention by the MIEC will serve the public interest by assisting the Commission's record for decision in this case.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke

Diana M. Vuylsteke, # 42419

211 N. Broadway, Suite 3600

St. Louis, Missouri 63102

Telephone: (314) 259-2543

Facsimile: (314) 259-2020

E-mail: [dmvuylsteke@bryancave.com](mailto:dmvuylsteke@bryancave.com)

Attorney for The Missouri Industrial  
Energy Consumers

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 1<sup>st</sup> day of November, 2011, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke