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

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In the Matter of the Application of Evergy Metro, Inc. d/b/a Evergy Missouri Metro for Approval of a Transpiration Electrification Portfolio.

File No. ET-2021-0151

## **APPLICATION TO INTERVENE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and pursuant to 20 CSR 4240-2.075, requests the Missouri Public Service Commission ("Commission") grant it intervention in the above case. For its *Application*, Ameren Missouri states as follows:

1. On February 24, 2021, Evergy Metro, Inc. d/b/a Evergy Missouri Metro applied for approval of a transportation electrification pilot program. On February 25, 2021, the Commission issued its *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff's Recommendation* ("*Order*"). This *Order* established an intervention deadline of March 19, 2021, and a recommendation from the Commission's Staff "Staff") by March 29, 2021.

2. Because it is also an electrical corporation in the state of Missouri that has been developing transportation electrification programs within its own service territory, Ameren Missouri has an interest in the progress of these proceedings. Any decision resulting from a hearing in this proceeding could prove precedential in Ameren Missouri's program development. Because no procedural schedule has yet been approved in this proceeding, granting intervention to the Company will not disrupt the progress of this proceeding.

3. Ameren Missouri has not yet taken a position in this case.

4. Pleadings, notices, and other correspondence in this case should be directed to undersigned counsel.

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WHEREFORE, for the reasons cited above, Ameren Missouri respectfully requests that the Commission grant its request for intervention.

Respectfully submitted,

Is Paula N. Johnson

Paula N. Johnson, # 68963 Senior Corporate Counsel Ameren Missouri P.O. Box 66149 St. Louis, MO 63166-6149 (314) 554-3533 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

## ATTORNEY FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 26<sup>th</sup> day of February, 2021.

*[s] Paula N. Johnson* Paula N. Johnson