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

|   | ) |              |
|---|---|--------------|
|   | ) |              |
| In the Matter of the Application of Union       | ) |              |
| Electric Company d/b/a Ameren Missouri          | ) |              |
| for Permission and Approval and a Certificate   | ) | EA-2019-0021 |
| of Public Convenience and Necessity Authorizing | ) |              |
| it to Construct a Wind Generation               | ) |              |
| Facility.                                       | ) |              |
|   | ) |              |
|   | ) |              |

## TARKIO R-I SCHOOL DISTRICT'S APPLICATION TO INTERVENE

COMES NOW the Tarkio R-I School District ("District"), by and through its counsel EdCounsel, LLC and pursuant to Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.075, applies to intervene in the above case. For its Application, the District states:

- 1. The District is a political subdivision created under the laws of the State of Missouri as a seven-director school district located in Atchison County, Missouri.
  - 2. The District is represented by counsel signed hereunder.
  - 3. The District receives revenue from the assessment of state and local taxes.
- 4. The District is interested in this matter because any final order issued in this case may reduce general revenue payable to the District as a result of changes requested by Petitioner. Such reduction in tax revenues will have a permanent and direct adverse impact on District operations and the services provided to the students of the District.
- 5. The District opposes the relief sought by the Petitioner as it is currently requested.
  WHEREFORE, the District respectfully requests that the Commission grant this
  Application to Intervene, along with any further relief the Commission deems just and proper.

Respectfully submitted,

EdCounsel, LLC

By: /s/ Duane A. Martin

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Attorneys for Tarkio R-I School District

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via email on November 2, 2018 to all parties on the Commission's service list in this case.

/s/ Duane A. Martin