

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

In the Matter of an investigation into Whether )  
Ratepayers are being Held Harmless from the ) Case No. ER-2008-0015  
Taum Sauk Disaster )

**STATE OF MISSOURI'S APPLICATION TO INTERVENE**

The State of Missouri, pursuant to §§ 4 CSR 240.2-070 & 2-075, files its Application to Intervene in the above referenced matter, and in support thereof states as follows:

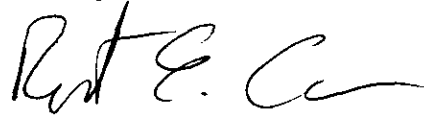
1. On July 12, 2007, the Office of the Public Counsel filed a motion to open a new case to investigate whether ratepayers are being held harmless from the Taum Sauk Disaster. On August 9, 2007, this Commission ordered all interested parties to respond to the OPC's motion by August 31, 2007.
2. The State of Missouri is one of UE's largest customers.
3. The State of Missouri's interests in this matter are different from that of the general public and an increase in the rates for electric service as a result of the Taum Sauk disaster will have a significant effect on the State's budget.
4. The State of Missouri has an interest in assuring that it is not paying for the costs of the Taum Sauk disaster through its electric rates. And also has an interest in assuring that UE is truly holding ratepayers harmless for the Taum Sauk disaster.
5. The State of Missouri has intervened in UE's rate or complaint cases in the past, including the recent electric rate case, to protect its unique interests as a customer of UE.

6. Granting the State's requested intervention would serve the public interest.

WHEREFORE, if this Commission opens a case to determine whether ratepayers are being held harmless from the Taum Sauk disaster, the State of Missouri requests it be allowed to intervene in that case.

Respectfully Submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General

A handwritten signature in black ink, appearing to read "Robert E. Carlson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following parties by United States Mail, first class postage prepaid on August 31, 2007:

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