

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

In the Matter of Union Electric Company d/b/a)	
AmerenUE's Tariffs to Increase Its Annual)	<u>Case No. ER-2008-0318</u>
Revenues for Electric Service.)	<u>Tariff Nos. YE-2008-0605</u>

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (hereinafter "Consumers Council" or "CCM"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated by Union Electric Company d/b/a AmerenUE ("AmerenUE") when it filed new proposed tariff sheets on April 4, 2008, requesting an additional rate increase of approximately \$251 million annually.

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit membership organization that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council is a member of the Consumer Federation of America. Consumers Council has hundreds of members who live in AmerenUE's Missouri electric service territory and who are residential customers of AmerenUE electric service. The Consumers Council's main office is located in

AmerenUE's Missouri electric service territory at 2510 Sutton Blvd., St. Louis, Missouri 63143-2116. Its website can be accessed at www.moconsumers.org.

Correspondence, communications, orders and the decision in this matter should be addressed to:

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2. On April 7, 2008, this Commission issued an Order directing interested parties wishing to intervene to do so by April 28, 2008, and thus, this application is timely.

3. Consumers Council has a historical legacy of rate case participation before the Public Service Commission. Consumers Council is the successor organization to the "Utility Consumers Council of Missouri" which, under that name, was an active party to numerous Public Service Commission cases during the 1970s. In several of those cases, Consumers Council represented the interest of Union Electric Company's residential electric ratepayers. Consumers Council intervened and participated in AmerenUE's previous electric rate case, Case No. ER-2007-0002.

4. Consumers Council's interest in this matter relates to the proposed rates, terms and conditions of service for AmerenUE's residential electric customers. Consumers Council anticipates that significant disputes will arise in this rate case regarding both revenue requirement and rate design. Consumers Council's interest in the rates charged to the residential customer class and the terms of service for that customer class is different than the general public interest. Numerous other entities have applied for intervention in this rate case on behalf of customer classes serving large customers. The Office of the Public Counsel (Public Counsel) itself represents the general public interest on behalf of the state of Missouri, but does not *exclusively* represent the residential class, absent a special determination that would be made pursuant to procedures set out in Section 386.710.1(3) RSMo 2000.

5. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for AmerenUE's residential electric customers. After further investigation, Consumers Council plans to provide the Commission with a more detailed position on the proposals and testimony submitted in this case. Accordingly, Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, the Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 26th day of April 2008:

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