

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

In the Matter of Kansas City Power & Light	)	
Company's Application for Approval of	)	
Demand-Side Programs and for Authority to	)	File No. EO-2012-0008
Establish a Demand-Side Programs Investment	)	
Mechanism.	)	

**AMEREN MISSOURI'S APPLICATION FOR  
INTERVENTION**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), pursuant to 4 CSR. 240-2.075, and for its Application for Intervention in this case, states as follows:

1. Ameren Missouri is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission (Commission). There is already on file with the Commission a certified copy of the Company's Articles of Incorporation (See Commission Case. No. EA-87-105), a Certificate of Corporate Good Standing (See Case No. EO-2012-0134), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See Case No. EN-2011-0069), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. On December 22, 2011, Kansas City Power & Light Company (KCPL) filed its *Application for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism (Application)*.

3. On December 23, 2011, the Commission filed an *Order Directing Notice and*

*Establishing Deadline for Filing Requests to Intervene*, setting January 13, 2012 as the deadline to intervene.

4. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Wendy K. Tatro  
Associate General Counsel  
and  
Thomas M. Byrne  
Managing Associate General Counsel  
Ameren Services Company  
1901 Chouteau Ave.  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
314-554-3484 (Wendy K. Tatro)  
314-554-2514 (Thomas M. Byrne)  
314-554-4014 (Fax)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

And

James B. Lowery, #40503  
Suite 200, City Centre Building  
111 South Ninth Street  
P.O. Box 918  
Columbia, MO 65205-0918  
Phone (573) 443-3141  
Facsimile (573) 442-6686  
[lowery@smithlewis.com](mailto:lowery@smithlewis.com)

5. Ameren Missouri supports the *Application* as filed by KCPL.

6. This *Application* and the *Application* filed by KCPL Greater Missouri Operations Company (GMO) (Case No. EO-2012-0009) are the first cases filed under the Missouri Energy Efficiency Investment Act (MEEIA). Ameren Missouri anticipates making its own filing under MEEIA and so may be impacted by the Commission's decision in this case. Ameren Missouri's interest is different than the general public and allowing Ameren Missouri to participate will

assist in creating the record for a Commission decision in this case.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

/s/ Wendy K Tatro

Wendy K. Tatro, # 60261  
Associate General Counsel  
Thomas M. Byrne, #33340  
Managing Associate General Counsel  
Ameren Services Company  
1901 Chouteau Ave.  
P.O. Box 66149 (MC 1310)  
St. Louis, MO 63166-6149  
(314) 554-3484 (phone) (314)  
554-4014 (fax)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

**Attorneys for Ameren Missouri**

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Ameren Missouri's Application for Intervention was served via electronic mail (e-mail) on this 13th day of January 2012, on

**Missouri Public Service  
Commission**

Office General Counsel  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[GenCounsel@psc.mo.gov](mailto:GenCounsel@psc.mo.gov)

**Missouri Public Service  
Commission**

Nathan Williams  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Nathan.Williams@psc.mo.gov](mailto:Nathan.Williams@psc.mo.gov)

**Office of the Public Counsel**

Lewis Mills  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

**Kansas City Power & Light  
Company**

James M Fischer  
Larry W. Dority  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)  
[lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)

**Kansas City Power & Light  
Company**

Roger W Steiner  
1200 Main Street, 16th Floor  
P.O. Box 418679  
Kansas City, MO 64105-9679  
[roger.steiner@kcpl.com](mailto:roger.steiner@kcpl.com)

*/s/ Wendy K. Tatro*

\_\_\_\_\_  
Wendy K. Tatro