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

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In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism

File No. EO-2015-0240

## 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. EA-2015-0273), and a copy of the 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. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Matthew R. Tomc Corporate Counsel Ameren Missouri 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 amerenmoservice@ameren.com 3. Ameren Missouri has an interest in this case that is different from that of the general public and may be adversely affected by a final order arising from this case. Moreover, Ameren Missouri's intervention is in the public interest. Ameren Missouri's interest in this case arises from its status as only one of three investor-owned electric utilities regulated by the Commission in the state with a direct and specific interest in the issues raised in this case, including the Commission's interpretation and application of the Missouri Energy Efficiency Investment Act.

Ameren Missouri is generally supportive of the relief requested by Kansas
City Power & Light Company and on the issues 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,

*Is/ Matthew R. Tomc*  **Matthew R. Tomc**, #66571 Corporate Counsel 1901 Chouteau Avenue, MC 1310 P.O. Box 66149 St. Louis, MO 63166-6149 (314) 554-3484 (phone) (314) 554-4014 (facsimile) amerenmoservice@ameren.com

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

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 2<sup>nd</sup> day of September, 2015.

<u>/s/ Matthew R. Tomc</u> Matthew R. Tomc