

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

In the Matter of Union Electric Company)		
d/b/a AmerenUE for Authority to File)		
Tariffs Increasing Rates for Electric)	Case No.	ER-2011-0028
Service Provided to Customers in the)		
Company's Missouri Service Area.)		

**VERIFIED APPLICATION OF IBEW AND OPERATING ENGINEERS UNIONS
TO INTERVENE**

COME NOW International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Union of Operating Engineers Local 148, AFL-CIO ("Unions"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, the Unions state:

1. This matter involves an application filed by Union Electric Company d/b/a AmerenUE ("Ameren") requesting a general rate increase.
2. The Unions are labor organizations that represent a large number of non-managerial, construction, production, and maintenance employees at a variety of Ameren's Missouri and Illinois facilities. The benefit packages of employees of the local unions exclusively representing Illinois employees are tied together with those representing Missouri employees.
3. The Unions are unincorporated associations. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, the Unions do not have evidence of any such registration. The Unions may be contacted at the address and telephone number listed here:

Michael D. Walter
Business Manager

IBEW Local 1439
2121 59th Street
St. Louis MO 63110
(314) 644-6111

4. Though the Unions are “associations,” they do not seem to be the type of associations to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) is directed. It does not appear to be the intent of those regulatory subsections for the Unions to file a list of all of their members, and the Unions hereby respectfully request a waiver of complying with said requirement. Should this Commission determine that the Unions must comply with the subsection, the required list will be tendered immediately.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Sherrie A. Schroder, MBN 40949
Michael A. Evans, MBN 58583
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
saschroder@hammondshinners.com (E-mail)
mevans@hammondshinners.com (email)

6. The Unions do not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. The Unions do not have any annual reports or assessment fees that are overdue.

8. The Unions seek permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representatives of certain of Ameren’s non-managerial, non-professional employees, the Unions and the employees

they represent have interests in this proceeding which are clearly different from those of Ameren, the general public, or any other party. Where the public's interests here are concentrated in the safe and dependable delivery of electricity at a reasonable cost, the Unions and the employees they represent are additionally concerned with the impact the proposed general rate increase could have on jobs, pensions, and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

10. No other party to this proceeding can adequately represent the additional, legitimate concerns of the Unions and the employees they represent here.

WHEREFORE, the Unions respectfully ask the Commission to grant this application and to permit the Unions to intervene here.


Respectfully submitted,

/s/ Sherrie A. Schroder

SHERRIE A. SCHRODER, MBN 40949
MICHAEL A. EVANS, MBN 58583
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
mevans@hammondshinners.com (email)
saschroder@hammondshinners.com (email)
Attorneys for the Unions

VERIFICATION

COMES NOW Sherrie A. Schroder and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Schroder further states that she has been authorized to sign and file this application on behalf of the Unions.


SHERRIE A. SCHRODER

Subscribed and sworn to before me this 4th day of October, 2009.

My Commission Expires:


Notary Public



MELANIE E. WILHELM
My Commission Expires
February 28, 2011
St. Louis County
Commission #07017667

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on October 4, 2010, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie A. Schroder