BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Kansas City)	
Power & Light Company Greater Missouri)	
Operations Company for Approval to Make Certain)	Case No. ER-2010-0356
Changes to its Charges for Electric Service)	

AMERENUE'S APPLICATION FOR INTERVENTION

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

- 1. AmerenUE 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 Restated Articles of Incorporation (*see*, Commission Case. No. EO-96-431), a Certificate of Corporate Good Standing (*see*, Commission Case No. EF-2003-0514), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (*see*, Commission Case No. GO-98-486), 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:

Thomas M. Byrne
Managing Associate General Counsel
Ameren Services Company
1901 Chouteau Ave.
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St. Louis, MO 63166-6149
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and

James B. Lowery Smith Lewis, LLP 111 South Ninth Street, Suite 200 P.O. Box 918 Columbia, MO 65205-0918 lowery@smithlewis.com

- 3. AmerenUE has an interest in this case that is different from that of the general public and which may be adversely affected by a final order arising from this case. Moreover, AmerenUE's intervention is in the public interest. AmerenUE'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 treatment of various revenue and expense items and, in particular, the Commission's examination of Kansas City Power & Light Company Greater Missouiri Operations ("KCPL-GMO") inclusion in rate base of its share of the new Iatan 2 Plant.
- 4. At this time, AmerenUE is unable to state its position relating to the relief sought by KCPL-GMO and is unsure of the positions it may take on the issues.

WHEREFORE, AmerenUE 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,

SMITH LEWIS, LLP

/s/ James B. Lowery

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Attorneys for AmerenUE

Dated: June 16, 2010

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing AmerenUE's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 16th day of June, 2010, on:

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<u>/s/ James B. Lowery</u> James B. Lowery