

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for an Accounting Authority Order to) Case No. EU-2021-0027
Record and Preserve Net Costs and)
Revenues Related to COVID-19)

**APPLICATION TO INTERVENE OUT OF TIME OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and submits its Application to Intervene Out of Time in this proceeding pursuant to 4 CSR 4240-2.075 (10).

In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”).

2. As a representative of the interests of large industrial customers of Ameren Missouri, the MIEC’s interest is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

3. Good cause exists to grant the MIEC’s Application, which was delayed due to the need for client consultation. This case is at an early stage, and no party will be prejudiced if this Application is granted. The MIEC accepts the record established in this case, including the requirements of the Commission’s orders in this case.

4. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Application to Intervene Out of Time together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

Diana M. Plescia #42419
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
Telephone: (314) 725-8788
Facsimile: (314) 725-8789
E-mail: dplescia@chgolaw.com

Attorney for the Missouri Industrial
Energy Consumers

**CERTIFICATE OF
SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 18th day of November, 2020, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia