

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
AmerenUE's Tariff to Increase Its Annual) Case No. ER-2011-0028
Revenues for Electric Service)

APPLICATION TO INTERVENE
OF THE MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Buzzi Unicem USA, Inc., and SSM HealthCare, (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. Applicants own and operate not-for profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of electricity from Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") as well as utilities from other utility companies in the state of Missouri.

2. The matters to be considered in this case and the Public Service Commission's ("Commission") determinations thereon, could have a direct and significant impact on Applicants' cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record.

3. As large user customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants do not at this time have sufficient information to assert a position on this case, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, and any documents of other parties filed herein.

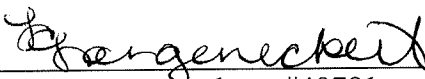
4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Lisa C. Langeneckert.
Sandberg Phoenix & von Gontard P.C.
600 Washington Avenue – 15th Floor
St. Louis, MO 63101-1313

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,

SANDBERG PHOENIX & von GONTARD P.C.

By: 

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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. ER-2011-0028.

Dated at St. Louis, Missouri this 13th day of September, 2010



Lisa C. Langeneckert