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

In the Matter of the Application of Kansas City	)	
Power & Light Company for Approval to Make	)	
Certain Changes in its Charges for Electric	)	Case Nos. ER-2012-0174
Service to Implement its Regulatory Plan	)	ER-2012-0175

## AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), pursuant to 4 C.S.R. 240-2.075, and for its Application for Intervention in these cases, 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. EO-2012-0142), 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:

Thomas M. Byrne
Managing Associate General Counsel
Ameren Services Company
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
tbyrne@ameren.com

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. Ameren Missouri 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, 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 treatment of various revenue and expense items.
- 4. At this time, Ameren Missouri is unable to state its position relating to the relief sought by Kansas City Power and Light Company and KCP&L Greater Missouri Operations Company and is unsure of the positions it may take on the issues.

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,

SMITH LEWIS, LLP

## /s/ James B. Lowery

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**Attorneys for Ameren Missouri** 

Dated: March 12, 2012

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Ameren Missouri's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 12<sup>th</sup> day of March, 2012, on:

Staff of the Missouri Public Service Commission Governor Office Building PO Box 360 Jefferson City, MO 65102 gencounsel@psc.mo.gov

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ADD ANY OTHERS WHO HAVE BEEN GRANTED INTERVENTION

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