BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Request for)	
Deferral and Authorization Authority)	Case No. EU-2020-0114
Relating to Certain Callaway Energy)	
Center Operations and Maintenance)	
Expenses)	

APPLICATION TO INTERVENE OF MIDWEST ENERGY CONSUMERS GROUP

COMES NOW the Midwest Energy Consumers Group ("MECG") and, pursuant to 20 CSR 4240-2.075 and this Commission's October 29, 2019, *Amended Order Directing Notice*, *Setting Intervention Deadline and Directing Staff Recommendation*, files its application to intervene. For its application, MECG states as follows:

- 1. MECG is a Missouri nonprofit corporation that represents the interests of commercial and industrial customers in matters involving utility issues. Those interests include the interests of large commercial and industrial customers of Ameren Missouri ("Ameren").
- 2. As a representative of the interests of large commercial and industrial customers of Ameren, the MECG's interest is different than that of the general public and may be adversely affected by actions taken as a result of filings and decisions in this case.
- 3. MECG 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.
- 4. MECG's intervention will serve the public interest by assisting the Commission's record for decision in this case.
 - 5. No party will be prejudiced by MECG's intervention.

WHEREFORE, MECG requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

David L. Woodsmall, MBE #40747 308 East High Street, Suite 204 Jefferson City, Missouri 65101 (573) 797-0005 (telephone)

 $\underline{david.woodsmall@woodsmalllaw.com}$

ATTORNEY FOR THE MIDWEST ENERGY CONSUMERS GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

David L. Woodsmall

Washind

Dated: November 13, 2019