

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust Its)
Revenues for Electric Service) Case No. ER-2021-0240

**APPLICATION TO INTERVENE OF
LEGAL SERVICES OF EASTERN MISSOURI, INC.**

COMES NOW, Legal Services of Eastern Missouri, Inc. (“LSEM”), and pursuant to 20-CSR 4240-2.075, respectfully applies to intervene in the above case initiated by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”). In support of its Application, LSEM states the following:

1. LSEM is a nonprofit organization and legal aid agency dedicated to advancing justice through legal representation, education, and supportive services for low-income and indigent individuals and families, including seniors and persons with disabilities. LSEM’s principal place of business is 4232 Forest Park Avenue, St. Louis, MO 63108.

2. LSEM provides high quality free civil legal assistance and equal access to justice for low-income and indigent individuals and families, including seniors and persons with disabilities in twenty-one Missouri counties. Many of the individuals and families LSEM represents struggle to pay their electricity bills, are under constant threat of a disconnection, or have had their electricity service disconnected for nonpayment. Ensuring that electricity costs remain affordable and that essential electricity utility services remain accessible is critical to the safety and wellbeing of LSEM’s clients, because electricity disconnections can cause unsafe housing conditions, exacerbate individuals’ health conditions where electricity is necessary to help maintain stable

health (for example, where electricity is required for the use of certain medical devices), and because disconnections can and do lead to eviction and homelessness.

3. LSEM has a unique interest in Ameren Missouri's requested rate increase and other changes to its terms and conditions of service because of the likely adverse impact of these rate increases on low-income and indigent residential consumers such as LSEM's clients. As an advocate for low-income and indigent families and individuals, and because of its efforts to encourage equitable utility and related policies for the benefit of its clients, LSEM's interest is different than that of the general public, and such interest may be directly and significantly affected by a final determination arising from this case.

4. LSEM's intervention will serve the public interest by assisting the Commission's development of a more complete record for decision in this case.

5. LSEM does not yet have sufficient information to assert a specific position in this case, but reserves the right to assert positions after it has had an adequate opportunity to examine the record and any documentation filed in connection with this case.

6. Pleadings, notices, and other correspondence in this case should be directed to:

Paul A. Barrs
Legal Services of Eastern Missouri, Inc.
4232 Forest Park Avenue
St. Louis, MO 63108
(314) 256-8733
pabarrs@lsem.org

WHEREFORE, LSEM respectfully requests that the Commission grant this *Application to Intervene*, entitling it to fully participate in this proceeding.

Respectfully Submitted,

/s/ Paul A. Barrs

Paul Barrs # 69523

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Attorney for Legal Services of Eastern Missouri, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing response was served on all Parties of record on this 28th day of April 2021.

/s/ Paul A. Barrs