BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of KCP&L Greater Missouri **Operations Company's Application for Authority** to Establish a Renewable Energy Standard Rate Adjustment Mechanism.

)) File No. EO-2014-0151

AMEREN MISSOURI'S APPLICATION TO INTERVENE

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 this case, 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. EF-2014-0094), 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 Director - Assistant General Counsel Wendy K. Tatro – Corporate Counsel Ameren Services Company 1901 Chouteau Ave. P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149 tbyrne@ameren.com wtatro@ameren.com

and

James B. Lowery Smith Lewis, LLP 111 South Ninth Street, Suite 200 P.O. Box 918 Columbia, MO 65205-0918 <u>lowery@smithlewis.com</u>

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 four 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 consideration of a Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") under Missouri's Renewable Energy Standard ("RES"), which also applies to Ameren Missouri.

4. At this time, Ameren Missouri is unable to state its position relating to the relief sought by 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 to intervene.

Respectfully submitted,

SMITH LEWIS, LLP

/s/ James B. Lowery

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Attorneys for Ameren Missouri

Dated: May 15, 2014

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 15th day of May, 2014, on parties of record to this case.

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