

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri for)
Permission and Approval and a Certificate) File No. EA-2022-0244
Of Public Convenience and Necessity Authorizing)
It to Construct a Renewable Generation Facility)

MOTION FOR LEAVE TO FILE AMENDED APPLICATION TO INTERVENE OUT OF TIME OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and submits its Motion for Leave to Amend Application to Intervene Out of Time in this proceeding pursuant to 20 CSR 4240-2.075 (10). In support of this motion, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Ameren Missouri.

2. On July 15, 2022, the Commission issued its Order Directing Notice, Setting Intervention and Response Deadlines and Directing Staff Recommendation, which established an intervention deadline in this case of August 15, 2022.

3. On August 19, 2022, MIEC late-filed an Application to Intervene which inadvertently omitted a showing of good cause and definitive statement accepting the record as it stands as required by Commission Rule 4240-2.075 (10).

4. On September 8, 2022, the Commission issued its order denying the MIEC’s application.

5. The MIEC seeks to amend its prior Application to Intervene Out of Time to provide the previously omitted showings of good cause and definitive statement accepting the record as it stands.

6. WHEREFORE, the MIEC respectfully requests that the Commission grant this Motion for Leave to Amend Application to Intervene, together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia
Diana M. Plescia #42419
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
Telephone: (314) 725-8788
Mobile: (314)-704-8444
Facsimile: (314) 725-8789
E-mail: dplescia@chgolaw.com

Attorney for the Missouri
Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 14th day of October 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia