

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

In the Matter of the Application of Union)	
Electric Company d/b/a Ameren Missouri)	
for Permission and Approval and a Certificate)	
of Public Convenience and Necessity)	EA-2019-0021
Authorizing it to Construct a Wind Generation)	
Facility)	
)	

**FAIRFAX R-3 SCHOOL DISTRICT'S MOTION FOR LEAVE TO FILE ITS
APPLICATION TO INTERVENE INSTANTER**

COMES NOW Fairfax R-3 School District ("District"), by and through its counsel, Mickes O'Toole, LLC, and for its Motion for Leave to File its Application to Intervene Instanter, states as follows:

1. The District is represented by the undersigned counsel.
2. By oversight, the undersigned learned only yesterday morning that the deadline to intervene was November 2, 2012.
3. Upon such realization, the documents filed herein today were immediately prepared. Multiple efforts were made to electronically file said documents yesterday, under both counsel's log in profiles, to no avail. Efforts were made to reach the help desk to assist with the e-filing malfunction, but contact was not able to be made. Overnight mailing was also considered, but was ultimately not an option because of the legal holiday, the mailing address being a P.O. box, and Fed Ex being unable to deliver to a P.O. box.
4. The foregoing resulted in the filings herein not being able to be filed until today.
5. The District's failure to intervene by the deadline is purely by oversight of the undersigned and at no fault of the District.
6. To avoid any prejudice to the District for a failure that is no fault of its own, the

undersigned, on behalf of the District, respectfully requests leave to file the District's application to intervene instanter.

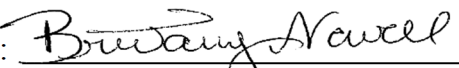
7. In addition, the deadline to intervene has only passed by a matter of days and the matter has not significantly progressed at this point. Thus, no party will be prejudiced by granting the District's Motion.

8. The District's Application to Intervene has been filed contemporaneously herewith.

WHEREFORE, Fairfax R-3 respectfully requests this Commission grant its Motion for Leave to File its Application to Intervene Instanter, and for all such other and further relief as this Commission deems just and proper.

Respectfully submitted,

MICKES O'TOOLE, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2018, a true and correct copy of the foregoing was served via email to all parties on the Commission's service list in this case.

