

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

In The Matter of Union Electric Company d/b/a        )  
Ameren Missouri’s 2020 Utility Resource            )        File No. EO-2021-0021  
Filing Pursuant to 20 CSR 4240 – Chapter 22        )

**APPLICATION TO INTERVENE OF  
THE MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“Applicants” or “MECG”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and the Commission’s September 28, 2020 *Order Directing Notice and Setting Deadline for Intervention Requests*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity in the service areas of Missouri public utilities including Ameren Missouri.

2. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on Applicants’ cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record.

3. As a representative of large user customers of Ameren Missouri, the Applicant has a direct and immediate interest in these proceedings that is different from that of the general public. To this point, MECG has been granted intervention in Ameren’s last several rate proceedings. While Applicants do not at this time have sufficient information to assert a position on this investigation, they reserve the right to

assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall  
Woodsmall Law Office  
308 East High Street, Suite 204  
Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention.

Respectfully submitted,

          /s/ David Woodsmall            
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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.

          /s/ David Woodsmall            
David L. Woodsmall

Dated: September 29, 2020