

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

**In the Matter of MoGas Pipeline, LLC**

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Case No. GC-2011-0138

**AMEREN MISSOURI'S APPLICATION FOR INTERVENTION**

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 Restated Articles of Incorporation (*see*, Commission Case. No. EO-96-431), a Certificate of Corporate Good Standing (*see*, Commission Case No. EF-2003-0514), and a copy of Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (*see*, Commission Case No. GO-98-486), 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:

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3. Ameren Missouri has a direct interest in this case as it is currently involved in litigation against MoGas Pipeline LLC (“MoGas”) to seek recovery, on behalf of its customers, of overcharges made by MoGas under the former tariffs which MoGas now seeks to have declared unlawful through its collateral attack of the Revised Report and Order issued by this Commission in Case No. GC-2006-0491. As such, Ameren Missouri has an interest different from that of the general public and which may be adversely affected by a final order arising from this case.

4. At this time, Ameren Missouri opposes the relief sought by MoGas in its Application and Complaint.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

**SMITH LEWIS, LLP**

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**Attorneys for Ameren Missouri**

Dated: November 18, 2010

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Ameren Missouri's Application for Intervention was served via electronic mail (e-mail) on this 18th day of November 2010, on

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