

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

In the Matter of the Application of Union)	
Electric Company d/b/a Ameren Missouri)	
For an Accounting Authority Order to)	Case No. GU-2021-0112
Record and Preserve Net Costs and)	
Revenues Related to COVID-19)	

MISSOURI SCHOOL BOARDS' ASSOCIATION
APPLICATION TO INTERVENE

Comes Now the Missouri School Boards' Association (hereinafter "MSBA"), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 20 CSR 4240-2.075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. MSBA is a 501(c)(6) not-for-profit corporation representing 390 school districts in the State of Missouri as a trade association, many of which are subject to Union Electric Company d/b/a Ameren Missouri's (hereinafter "Ameren") electric and natural gas tariff rates.
2. Missouri Section 393.310 RSMo., clearly recognizes the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school tariff filings, gas purchasing, gas resale, gas metering, and gas aggregation.
3. On October 16, 2020, Ameren applied for accounting authority orders permitting them to track and defer in regulatory assets all incremental costs and other financial impacts specifically including lost revenues related to the COVID-19 pandemic.
4. MSBA opposes the issuance of an Accounting Authority Order to the extent it would carve out a single issue and allow retroactive recovery of lost revenues and/or expenses related to COVID-19. MSBA is aware of the financial hardships to the utilities created by the

pandemic. The Commission must also recognize the schools are also at risk to suffer significant revenue losses due to decreased tax revenue as a result of decreased commercial businesses and loss of taxes to municipalities. This in turn will lead to lost tax revenues to the schools.

5. MSBA's interests in this filing are unique and cannot be reasonably represented by any other entity.

6. MSBA has been granted intervenor status in previous filings by the Public Service Commission in other gas utility cases and actively participated in those proceedings.

WHEREFORE, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

Respectfully submitted,
RSBIII, LLC



Richard S. Brownlee III, MO Bar #22422
Attorney for Missouri School Boards' Association
121 Madison Street
Jefferson City, MO 65101
(573) 616-1911
rbrownlee@rsblobby.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 5th day of November, 2020.



Richard S. Brownlee III, Attorney