

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 )  
of Public Convenience and Necessity Authorizing ) File No. EA-2022-0244  
it to Construct a Renewable Generation Facility )

**APPLICATION TO INTERVENE OUT OF TIME OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

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

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues.

2. The MIEC’s interests are different than that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

3. Good cause exists to grant the MIEC’s application, which was delayed due to the need for client consultation. This case is at an early stage, and no party will be prejudiced if this application is granted. The MIEC accepts the record as it stands, including the requirements of the Commission’s orders in this case.

4. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Amended Application to Intervene Out of Time 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

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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 14<sup>th</sup> day of October 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia