

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

In the Matter of the Application of)	
Union Electric Company for Authority)	Case No. EO-2011-0128
To Continue the Transfer of)	
Functional Control of Its Transmission)	
System to the Midwest Independent)	
Transmission System Operator, Inc.)	

**APPLICATION TO INTERVENE OUT OF TIME OF THE
MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”), pursuant to Missouri Public Service Commission (“Commission”) rule 4 CSR 240-2.075, and files its Application to Intervene in the referenced case. In support thereof, MJMEUC states as follows:

1. On November 1, 2010 Union Electric Company d/b/a Ameren Missouri filed a request to continue membership in MISO beyond December 31, 2013.
2. On November 2, 2010 the Commission established a deadline for interventions by November 24, 2010.
3. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC.

4. MJMEUC serves 14 municipalities directly embedded in Ameren Missouri's transmission system that take transmission service through the Midwest Independent System Operator ("MISO").
5. On May 18, 2011 MISO gave a presentation to the Commission outlining proposed changes to Module E (Resource Adequacy Requirements (RAR)) of the MISO tariff.
6. While such changes were suggested as a possibility in Ameren Missouri's initial pleading (p.8), the scope and methodology of such changes was not known at that time.
7. MJMEUC is a part-owner of the Prairie State Energy Campus in southern Illinois. Prairie State is a 1,600 MW two unit super-critical coal generator. MJMEUC's expected ownership share is 195 MW of energy and capacity, and represents a significant investment.
8. MJMEUC's interest in Prairie State will serve multiple municipalities inside of Ameren Missouri, and with full operation of the plant expected by 2012.
9. Ameren Missouri has made substantial upgrades to the transmission facilities connecting Prairie State to Missouri, including a new transmission line over the Mississippi River, with a connection to Ameren Missouri's Rush Island Plant.
10. MISO's proposal to modify RAR requirements would be done by creating a 'capacity test' to examine transmission availability between transmission zones when determining capacity for RAR purposes, and making Illinois and Missouri separate zones.

11. This new test proposed by MISO will materially affect MJMEUC, in that MJMEUC is not assured of passing capacity benefits to its municipalities that are purchasing energy and capacity from Prairie State through MJMEUC.
12. Given MISO's recent announcement of its intentions to modify its RAR, and the method by which it intends to do so, and the potential for harm to MJMEUC, and that Ameren Missouri's current Commission authority to participate in MISO does not expire until December 31, 2013, MJMEUC would request to be allowed to intervene out of time in this proceeding. The potential harm to MJMEUC is far greater than the potential harm from a delay in these proceedings to the other parties.
13. MJMEUC opposes the relief requested by Ameren Missouri.
12. Communications in regard to this Application should be addressed to:

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WHEREFORE, MJMEUC prays that this Commission issue an order granting its application to intervene out of time in this proceeding and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Douglas L. Healy

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ATTORNEY FOR MJMEUC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing application to intervene out of time was served by e-mailing a copy to all parties on the Commission's Service List this 1st day of June, 2011.

/s/ Douglas L. Healy
DOUGLAS L. HEALY