

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

In the Matter of Union Electric Company d/b/a	)	
AmerenUE's Tariff Establishing an Industrial	)	Case No. ET-2007-0459
Demand Response Program.	)	

**APPLICATION TO INTERVENE OF THE  
MISSOURI ENERGY GROUP**

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Buzzi Unicem USA, Inc., Holcim US, Inc. and SSM HealthCare, (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. The MEG was granted intervention in Case No. ER-2007-0002 by the Public Service Commission ("Commission") on August 1, 2006.
2. The Commission's Report and Order in Case No. ER-2007-0002, issued May 22, 2007 indicated that the Commission would "open a new investigative case for the purpose of discussing demand response programs with all of Missouri's electric utilities, as well as other interested parties."<sup>1</sup>
3. The Commission's Order opening the instant case was issued May 31, 2007.
4. Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") filed its proposed IDR tariff on July 2, 2007 with a 90-day effective date.

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<sup>1</sup> Commission Report and Order in ER-2007-0002 dated May 22, 2007 at 105

5. There was no indication in either Commission Order whether parties to Case No. ER-2007-002 would automatically become parties to the new investigative case. Therefore, the MEG is filing this Application to Intervene out of an abundance of caution.

6. Members of the MEG own and operate not-for-profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of electricity AmerenUE and other utility companies in the state of Missouri. MEG members Buzzi Unicem USA, Inc., and Holcim US Inc., have an especially strong interest in demand response power that is the subject of this case, having participated in Union Electric's interruptible tariffs in the past and having fully participated in the Industrial Demand Response ("IDR") portion of the hearings in ER-2007-0002.

7. The matters to be considered in this case and the Commission's determinations thereon, could have a direct significant impact on Applicants' options and costs for electric 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.

8. As large user customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. Applicants' position is that the IDR tariff filed by AmerenUE on July 2, 2007 as submitted is inadequate for large users' use but may be acceptable with modifications.

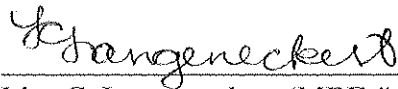
9. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Lisa C. Langeneckert, Esq.  
The Stolar Partnership LLP  
911 Washington Avenue, Suite 700  
St. Louis, MO 63101

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, and thereby entitle said Applicants to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,

THE STOLAR PARTNERSHIP LLP



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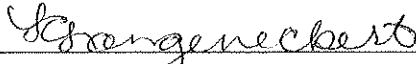
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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. ER-2007-0002 by electronic means or by U.S. mail, postage prepaid.

Dated at St. Louis, Missouri this 9th day of July, 2007

  
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Lisa C. Langeneckert