

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

In the Matter of The Empire District Electric )  
Company's Application for Approval of a )  
Transportation Electrification Portfolio for ) File No. ET-2020-0390  
Electric Customers in its Missouri Service )  
Area. )

**APPLICATION TO INTERVENE  
OUT OF TIME**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and pursuant to 20 CSR 4240-2.075, requests the Missouri Public Service Commission ("Commission") grant it intervention in the above case. For its *Application*, Ameren Missouri states as follows:

1. On November 29, 2020, The Empire District Electric Company ("Empire") applied for approval of a portfolio of transportation electrification pilot programs and accounting treatment. On December 1, 2020, the Commission issued its *Order Directing Notice, a Staff Recommendation, and Setting a Deadline for Intervention Applications* ("Order"). This Order established an intervention deadline of December 30, 2020, and a recommendation from the Commission's Staff "Staff") by January 15, 2021. On February 16, 2021, the parties to the proceeding submitted a *Proposed Schedule* which anticipates bi-weekly technical conferences and culminates in a hearing currently scheduled for June 22 – 23, 2021.

2. Ameren Missouri unfortunately did not request intervention by the December 30, 2021, deadline established by the Commission. However, because it is also an electrical corporation in the state of Missouri that has been developing transportation electrification programs within its own service territory, it has an interest in the progress of these proceedings. Any decision resulting from a hearing in this proceeding could prove precedential in Ameren

Missouri's program development. Because no procedural schedule has yet been approved in this proceeding, and because Ameren Missouri will not object to the proposed procedural submitted by the parties, granting intervention to the Company out of time will not disrupt the progress of this proceeding.

3. Ameren Missouri has not yet taken a position in this case.

4. Pleadings, notices, and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, for the reasons cited above, Ameren Missouri respectfully requests that the Commission grant its request for intervention.

Respectfully submitted,

*/s/ Paula N. Johnson*

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ATTORNEY FOR UNION ELECTRIC  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 26<sup>th</sup> day of February, 2021.

*Paula N. Johnson*  
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