BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company,)	
d/b/a AmerenUE's Tariff to Increase its)	File No. ER-2011-0028
Annual Revenues for Electric Service)	

APPLICATION TO INTERVENE BY THE MISSOURI RETAILERS ASSOCIATION

COMES NOW the Missouri Retailers Association (hereinafter "Missouri Retailers" or "MRA"), by and through counsel, pursuant to Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case.

In support of this Application, the Missouri Retailers state as follows:

- 1. The MRA is a not-for-profit association dedicated to serving the needs of retailers and grocers and their distribution facilities statewide. MRA has several members who are served by AmerenUE and which rely on dependable electric service at reasonable rates in order to survive in the current economy, in order to employ their workforce, and to continue to provide their products and services at reasonable prices. A list of MRA members is attached as Exhibit A. This interest is different than the general public interest.
- 2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Thomas R. Schwarz, Jr.
Stephanie S. Bell
Blitz, Bardgett & Deutsch, L.C.
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Jefferson City, MO 65101

Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358 E-mail: tschwarz@blitzbardgett.com E-mail: sbell@blitzbardgett.com

And

David Overfelt, President Missouri Retailers Association P.O. Box 1336 Jefferson City, MO 65102

Telephone No.: (573) 636-5128

E-mail: daye@moretailers.com

- 3. On September 7, 2010, this Commission issued an Order directing interested parties wishing to intervene to do so by September 27, 2010, and thus this Application is timely.
- 4. MRA is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for its members served by AmerenUE's electric service. MRA is also opposed to AmerenUE's request for an interim rate increase in this case. After further investigation, MRA plans to provide the Commission with a more detailed position on AmerenUE proposals and testimony submitted in this case.
- 5. MRA believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, the MRA respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

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CERTIFICATE OF SERVICE

I hereby certify that true copies of the foregoing Application to Intervene by the Missouri Retailers Association were sent to each of the following parties of record via electronic transmission this 20th day of September, 2010:

General Counsel's Office

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Thomas R. Schwarz, Jr

Missouri Retailers Association Members that are Affected by AmerenUE Rates

ABBCO Service Corporation

Accu-Care, Inc.

Aldi

All-Staff Nursing, Inc.

Altria Client Services, Inc.

Ameristaff

Best Buy Co., Inc.

BF&B Enterprises

BKC, Inc., d/b/a Schottzies Bar & Grill

Buch Mufflers, Inc., d/b/a Midas Auto Service Experts, et al.

Busch's Florist

C & F Restaurants, LLC, d/b/a PJ's Tavern

CFM of Mid-MO, d/b/a Convenient Food-Mart

Community Living, Inc.

Cooperative Attendant Services, Inc.

Crossings Restaurant, LLC, The

CVS Pharmacy

CWE Hospitality Services, LLC, d/b/a Chase Park Plaza

D.E. Enterprises, Inc., d/b/a St. Louis Staffing

Dee Lee Group The, LLC, d/b/a Giggers Riverfront Party Bar & Grill

Demac Equipment Corporation

Dierberg Markets, Inc.

Epworth Children & Family Services

Excel Home Care, Inc.

Forever Network, Inc.

Grace Hill Neighborhood Health Centers

Grace Hill Settlement House

Habcare, Inc.

HD Sports, Inc., d/b/a Sports Café

Hewitt-Lucas Body Company, Inc.

Home Depot, The

J. C. Penney Co., Inc.

Jefferson City Oil Co., Inc.

Jerry Haas Race Cars, Inc.

Jewish Center for the Aged

Judevine Center for Autism

Kaldi's, Inc.

Karl Bissinger, Inc.

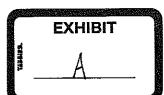
KEW Properties, d/b/a Sub Shop, Inc.

Lift for Life Academy & Gym, Inc.

Lift for Life Gym, Inc.

Liston Enterprises, Inc., d/b/a Seamus McDaniels

Lowell Manufacturing Company



Lowe's Companies, Inc.

Macy's

Madelaine Townhomes

Medve Group, Inc., The

Metro Home Inspections, Inc.

Metropolitan Design & Building Co., Inc.

Missouri Baptist Children's Home

Missouri Grocers Assn.

Mt. Washington Forever Cemetery (MWC, Inc.)

Northstar Battery Co., LLC

Nurses for Newborns Foundation

Old Town Donuts

Pepsi-Cola Bottling Company of New Haven

Physicians Optical Service

Pike County Memorial Hospital

Progressive Ballons, Inc.

Quik Trip Corporation

Red Shed, The

Reliant Care Mgt. Co., LLC

Schnuck Markets, Inc.

Schulte's Fresh Foods

SDM Company, d/b/a Culinary Personnel

Sears Holding Corporation

Sentinel Industries, Inc.

Target Stores

Village Bar, Inc., The

Walgreen Co.

West Missouri Beef, LLC

Wilco Development & Marketing, d/b/a Helco Tool & Gage

Woodard Cleaning & Restoration Services