

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

In the Matter of the Tariffs of Aquila, Inc.,	)	
d/b/a Aquila Networks – MPS	)	
and Aquila Networks – L&P Increasing	)	
Electric Rates for the Services	)	Case No. ER-2007-0004
Provided to Customers in the Aquila	)	
Networks - MPS and Aquila	)	
Networks - L&P Service Areas.	)	

**AMERENUE’S APPLICATION FOR INTERVENTION**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE” or “Company”), pursuant to 4 C.S.R. 240-2.075, and for its Application for Intervention in this case, states as follows:

1. AmerenUE is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission (“Commission”). There is already on file with the Commission a certified copy of the Company’s Restated Articles of Incorporation (*see*, Commission Case. No. EO-96-431), a Certificate of Corporate Good Standing (*see*, Commission Case No. EF-2003-0514), and a copy of Company’s Fictitious Name Registration as filed with the Missouri Secretary of State’s Office (*see*, Commission Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Thomas M. Byrne  
Managing Associate General Counsel  
Ameren Services Company  
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and

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3. AmerenUE has an interest in this case that is different from that of the general public and which may be adversely affected by a final order arising from this case. Moreover, AmerenUE's intervention is in the public interest. AmerenUE's interest in this case arises from its status as only one of four investor-owned electric utilities regulated by the Commission in the state with a direct and specific interest in the issues raised in this case, including the Commission's treatment of various revenue and expense items and, in particular, the Commission's handling of Aquila, Inc.'s ("Aquila") request to establish a fuel adjustment clause ("FAC").<sup>1</sup> Aquila is the only electric utility, other than AmerenUE, currently seeking to establish a FAC. Aquila's request for a FAC, like AmerenUE's request made in AmerenUE's pending general rate case proceeding, will likely present issues of first impression for the Commission's consideration relating to FACs that could as a practical matter affect AmerenUE and about which AmerenUE can provide information that would benefit the public interest.

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<sup>1</sup> As authorized by Section 386.266, RSMo (Senate Bill 179).

4. At this time, AmerenUE is unable to state its position relating to the relief sought by Aquila and is unsure of the positions it may take on the issues.

WHEREFORE, AmerenUE respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

SMITH LEWIS, LLP

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**Attorneys for AmerenUE**

Dated: July 19, 2006

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing AmerenUE's Application for Intervention was served via electronic mail (e-mail) or via regular mail on this 19th day of July, 2006, on:

Staff of the Missouri Public Service Commission  
Governor Office Building  
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**/s/ James B. Lowery**  
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