

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

In the Matter of Union Electric Company)		
d/b/a AmerenUE for Authority to File)		
Tariffs Increasing Rates for Electric)	Case No.	ER-2011-0028
Service Provided to Customers in the)		
Company's Missouri Service Area.)		

**MOTION FOR LEAVE TO FILE APPLICATION OF IBEW AND
OPERATING ENGINEERS UNIONS TO INTERVENE OUT OF TIME**

COME NOW International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Union of Operating Engineers Local 148, AFL-CIO (“Unions”), by counsel, and respectfully move this Commission for permission to file their application to intervene in this proceeding out of time. In support of this application, the Unions state:

1. By order dated September 7, 2010 (“Order”), the Commission set September 27, 2010 as the deadline for filing notice of intervention in this matter.
2. Although they have previously participated in rate proceedings relating to AmerenUE in the past and are receiving notices pertaining to the Fuel Adjustment Clause proceeding, the Unions did not receive notice or a copy of the order. Because they expected a new general rate case to be filed by the end of September, their counsel discovered the Order by reviewing the PSC website on this date.
3. The Unions’ late filing will not prevent it from meeting the other deadlines set forth in the Order.
4. Permitting the Unions to intervene at this date would in no way prejudice any party to these proceedings.

WHEREFORE, the Unions respectfully request the Commission give permission to file out of time their application for intervention, which is being submitted contemporaneously.

Respectfully submitted,

/s/ Sherrie A. Schroder

Sherrie A. Schroder, MBN 40949
Michael A. Evans, MBN 58583
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
saschroder@hammondshinners.com (email)
mevans@hammondshinners.com (email)
Attorneys for IBEW Local 1439

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this October 4, 2010.

/s/ Sherrie A. Schroder