

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

In the Matter of Ameren Missouri's 2017	)	
Utility Resource Filing Pursuant to	)	Case No. EO-2018-0038
4 CSR 240- Chapter 22	)	

**APPLICATION TO INTERVENE  
OF THE  
MISSOURI JOINT MUNICIPAL ELECTRICAL UTILITY COMMISSION**

COMES NOW, the Missouri Joint Municipal Electrical Utility Commission ("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075 and this Commission's September 25 *Order Directing Notice and Setting Deadline for Intervention Requests*, and files its application to intervene. In support thereof, MJMEUC states as follows:

1. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 *et seq.* RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Sixty-eight Missouri municipalities are current parties to the joint contract establishing the MJMEUC.

2. MJMEUC serves 13 municipalities directly embedded in Ameren's transmission system that take transmission service through the Midcontinent Independent System Operator ("MISO"), and MJMEUC itself is a transmission customer of Ameren.

3. MJMEUC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electrical systems that take transmission through MISO. Such interest is not currently represented in the proceedings.

4. MJMEUC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

5. Granting intervention to MJMEUC would serve the public interest by allowing MJMEUC's experience and insight to be part of the Integrated Resource Planning process.

6. No party will be prejudiced by MJMEUC's intervention.

WHEREFORE, MJMEUC requests that it be permitted to intervene and be made a party to this case for all purposes, and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

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Attorney for MJMEUC

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 13th day of October, 2017, to all parties on the Commission's service list in this case.

/s/ Terry M. Jarrett