

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

In the Matter of the Application of Evergy Metro,)
Inc. d/b/a Evergy Missouri Metro and Evergy)
Missouri West, Inc. d/b/a Evergy Missouri West) EU-2020-0350
for an Accounting Authority Order Allowing the)
Companies to Record and Preserve Costs Related)
to COVID-19 Expenses)

AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") pursuant to 20 CSR 4240-2.075, and for its Application for Intervention in this case, states as follows:

1. Ameren Missouri 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"). Ameren Missouri previously submitted to the Commission a certified copy of its Articles of Incorporation (See Case No. EA-87-105), as well as its Fictitious Name Registrations as filed with the Missouri Secretary of State's Office (See Case Nos. EA-2019-0181). The Company also provided a copy of a recent certified copy of its Certificate of Good Corporate Standing in File No. EO-2020-0315. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel and to:

Thomas Byrne
Senior Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue (MC 1450)
St. Louis, MO 63103
TByrne@ameren.com

3. Ameren Missouri's interest in this case arises from its status as a Commission-regulated investor-owned electric utility with a specific interest in some of the important regulatory issues in this case. By this application, Evergy Metro, Inc. d/b/a Evergy Missouri Metro ("Evergy Missouri Metro") and Evergy Missouri West, Inc. ("Evergy Missouri West") (collectively, "Evergy"), seeks an Accounting Authority Order ("AAO") from the Commission authorizing the Company to track and defer, in a regulatory asset, all extraordinary costs and associated financial impacts (including lost revenues) related to the COVID-19 pandemic. The Commission's consideration of such issues could, as a practical matter, have an impact upon similar issues as they arise in Ameren Missouri cases or other proceedings at the Commission, which in turn could have an impact on Ameren Missouri's business, making Ameren Missouri's interests different than the interests of the general public. Moreover, Ameren Missouri's intervention is in the public interest as it may aid the Commission in addressing the policy implications of such issues, including by allowing Ameren Missouri to present additional perspectives on such issues.

4. Ameren Missouri supports Evergy's request for a regulatory asset for the financial impacts of the COVID-19 pandemic.

WHEREFORE, Ameren Missouri 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,

/s/ Wendy K. Tatro

Wendy K. Tatro, MO Bar #60261
Director and Assistant General Counsel
1901 Chouteau Avenue, MC-1310
St. Louis, Missouri 63103
Telephone: (314) 554-3484
Facsimile: (314) 554-4014
AmerenMOService@ameren.com

James B. Lowery, MO Bar #40503
SMITH LEWIS, LLP
P.O. Box 918
Columbia, MO 65205-0918
Telephone: (573) 443-3141
Facsimile: (573) 442-6686
lowery@smithlewis.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 1st day of June, 2020.

/s/ Wendy Tatro
Wendy Tatro