

In the matter of the application of Missouri Gas Utility, Inc., for a certificate of convenience and necessity authorizing it to construct, install, own, operate, control, manage and maintain a distribution system to provide gas service in Benton, Morgan, Camden and Miller Counties in Missouri, as a new certificated area.)
)
)
) Case No. GA-2010-0012
)
)

COMES NOW, Union Electric Company, d/b/a AmerenUE (“AmerenUE”), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, AmerenUE states as follows:

2. On July 9, 2009, Missouri Gas Utility, Inc. (“MGU”) filed its application for a certificate of convenience and necessity authorizing it to construct, install, own, operate, control, manage and maintain a distribution system to provide gas service in Benton, Morgan, Camden and Miller Counties in Missouri. On July 13, 2009, the Commission issued its *Corrected Notice of Application, and Order Directing Staff to File a Recommendation and Setting Deadline for Intervention* and set a deadline for intervention of August 13, 2009.

3. AmerenUE seeks intervention because its certificated service territory is in the vicinity of the area for which a certificate is sought in this case and wants to ensure that there will be no overlap in the certificates issued by the Commission. As a consequence, AmerenUE's interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding. AmerenUE is unsure of the position it will take in this proceeding.

WHEREFORE, for the foregoing reasons, AmerenUE respectfully requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

By: /s/ Wendy K. Tatro
Steven R. Sullivan, # 33102
Senior Vice President, General
Counsel and Secretary
Wendy K. Tatro, # 60261
Associate General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenUEService@ameren.com

Dated: August 13, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 13th day of August, 2009, served the foregoing Application of Union Electric Company, d/b/a AmerenUE, to Intervene either by electronic means, or by U. S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission as shown below.

Missouri Public Service Commission
General Counsel Office
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Office of the Public Counsel
Lewis Mills
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102
opcservice@ded.mo.gov

Missouri Gas Utility, Inc.
Dean L. Cooper
P.O. Box 456
312 East Capitol
Jefferson City, MO 65102
dcooper@brydonlaw.com

Missouri Public Service Commission
Bob Berlin
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102
Bob.Berlin@psc.mo.gov

/s/ Wendy K. Tatro

Wendy K. Tatro