

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

**In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to)
Increase Its Revenues for Natural Gas Service)**

Case No. GR-2019-0077

**MISSOURI SCHOOL BOARDS’ ASSOCIATION
APPLICATION TO INTERVENE**

Comes Now the Missouri School Boards’ Association (hereinafter “MSBA”), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 4 CSR 240.2-075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. On December 3, 2018, Union Electric Company, d/b/a Ameren Missouri (hereinafter “Ameren”) filed tariffs designed to increase natural gas rates for Missouri jurisdictional customers.
2. MSBA is a 501(c)(6) not-for-profit corporation representing 387 elementary and secondary schools in the State of Missouri as a trade association.
3. MSBA has organized a purchasing cooperative denominated MOPURC (Missouri Purchasing Resource Center); also known as the MSBA Natural Gas Consortium, which is the authorized purchasing agent for over 2,650 utility accounts which purchase natural gas on the open market which is delivered to the various schools and school districts in Missouri under the statutory School Transportation Program (hereinafter “STP”). There are currently 286 Ameren accounts that participate in MOPUR’s STP purchasing group.
4. MSBA further states that it is an interested, if not necessary, party to this proceeding as it is the largest STP association in the Ameren service area and will be affected by

tariff alterations incidental to this case, in particular as related to gas transportation to the schools.

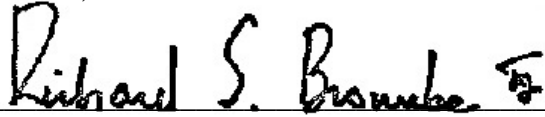
5. MSBA's interest in this proceeding is unique and different from the public in general.

6. MSBA's requested intervention would serve the public interest.

7. MSBA has been granted intervenor status in previous filings by the Public Service Commission in other Ameren utility cases and has actively participated in those proceedings.

WHEREFORE, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

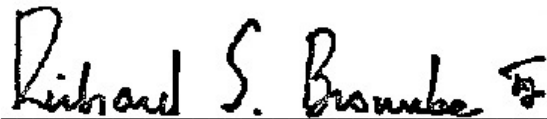
Respectfully submitted,
RSBIII, LLC



Richard S. Brownlee III, MO Bar #22422
Attorney for Missouri School Boards' Association
121 Madison Street
Jefferson City, MO 65101
(573) 616-1911
rbrownlee@rsblobby.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 12th day of December, 2018.



Richard S. Brownlee III, Attorney