

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Union Electric Company d/b/a)
Ameren Missouri's LED Street Lighting Update)
and Tariff Filing)

File No. ET-2016-0152
Tariff No. YE-2016-0159

APPLICATION TO INTERVENE
FOR THE CITY OF O'FALLON

COMES NOW the City of O'Fallon, pursuant to 4 CSR 240-2.075 and 2.080(20) of the Missouri Public Service Commission's Rules of Practice and Procedure and the Commission's December 17, 2015 Notice of Tariff Filing and Order Establishing Time to File Recommendation and Order Establishing Time to Apply to Intervene setting an intervention deadline of December 24, 2015, and for their Application to Intervene state as follows:

1. The City of O'Fallon ("Applicant") is a Missouri Constitutional Home Rule Charter City under Article 6 Section 19 of the Missouri Constitution organized and existing under the laws of the State of Missouri with its principal office located at 100 North Main Street, O'Fallon, Missouri 63366. O'Fallon is located in St. Charles County and has a population of approximately 76,000 residents. O'Fallon is a customer of Ameren UE and specifically is a large street lighting customer of Ameren UE.

2. As a street lighting customer of Ameren UE the interests of Applicant are different than that of the general public and may be adversely affected by a final order in this case.

3. Applicant take no position on Ameren's LED Street Lighting Tariffs at this time, but reserves their rights to take positions issues as the case proceeds.

4. The intervention by Applicant will serve the public interest by assisting and

informing the Commission on certain issues in this case.

5. Correspondence and communications regarding this application, including service of all notices and orders of this Commission should be addressed to:

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WHEREFORE, having stated the grounds for intervention and the position and interests of Applicant in these proceedings, Applicant asks that the Commission grant this Application to Intervene, and thereby entitle Applicant to full participation as a party – intervenor in these proceedings.

Respectfully Submitted,

CURTIS, HEINZ, GARRETT &
O'KEEFE, P.C.

/s/ Leland B. Curtis

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Attorneys for the City of O'Fallon

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed to the persons listed on the attached list on the 23rd day of December 2015

/s/ Leland B. Curtis

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