

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

In the Matter of the Application of Ameren )  
Transmission Company of Illinois for )  
Other Relief or, in the Alternative, a )  
Certificate of Public Convenience and )  
Necessity Authorizing it to Construct, )  
Install, Own, Operate, Maintain, and )  
Otherwise Control and Manage a 345,000- )  
Volt Electric Transmission Line from )  
Palmyra, Missouri, to the Iowa Border and )  
Associated Substation Near Kirksville, )  
Missouri. )

**File No. EA-2015-0146**

**VERIFIED APPLICATION OF IBEW LOCAL 1439  
TO INTERVENE OUT OF TIME**

COMES NOW International Brotherhood of Electrical Workers Local 1439, AFL-CIO (“the Union”), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, the Union states:

1. By Order dated June 2, 2015, the Commission set June 22, 2015 as the deadline for filing notice of intervention in this matter.
2. Due to vacation and other pending matters, the Union’s counsel did not become aware of the filing or the deadline to intervene until after it had passed.
3. This matter involves Applicant’s intention to construct and operate 95 miles of electric transmission line in Missouri, albeit for interstate use.
4. The Union’s late filing will not prevent it from meeting the other deadlines in this matter or delay this proceeding, if it is permitted to intervene. Moreover, the Union’s late filing will not prejudice any party.

5. The Union is a labor organization that represents a large number of non-managerial, construction and maintenance electrical employees a variety of Ameren's Missouri facilities.

6. The Union is an unincorporated association. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, the Union does not have evidence of any such registration. The Union may be contacted at the address and telephone number listed here:

Michael D. Walter  
Business Manager  
IBEW Local 1439  
2121 59th Street  
St. Louis MO 63110  
(314) 644-6111

7. Though the Union is an "association," it does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) is directed. It does not appear to be the intent of those regulatory subsections for the Union to file a list of all of its members, and the Union hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that the Union must comply with the subsection, the required list will be tendered immediately.

8. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Sherrie Hall, MBN 40949  
Emily Perez, MBN 62537  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[sahall@hammondshiners.com](mailto:sahall@hammondshiners.com) (e-mail)

eperez@hammondshinners.com (email)

9. The Union does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

10. The Union does not have any annual reports or assessment fees that are overdue.

11. The Union seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

12. As the exclusive collective bargaining representatives of certain of Ameren's non-managerial, non-professional employees, the Union and the employees it represents have interests in this proceeding which are clearly different from those of Ameren, the general public, or any other party. Where the public's interests here are concentrated in the safe and dependable delivery of electricity at a reasonable cost, the Union and the employees it represents are additionally concerned with the impact the proposed general rate increase could have on jobs, pensions, and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

13. No other party to this proceeding can adequately represent the additional, legitimate concerns of the Union and the employees it represents here.

WHEREFORE, the Union respectfully asks the Commission to grant this application and to permit the Union to intervene here.

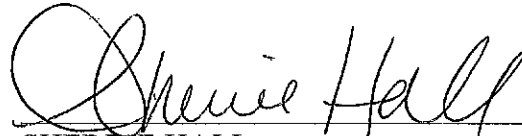
Respectfully submitted,

/s/ Sherrie Hall  
SHERRIE HALL, MBN 40949  
EMILY R. PEREZ, MBN 62537  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)

sahall@hammondshinners.com (email)  
eperez@hammondshinners.com (email)  
Attorneys for the IBEW Unions


**VERIFICATION**

COMES NOW Sherrie Hall and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Hall further states that she has been authorized to sign and file this application on behalf of the Union.

  
\_\_\_\_\_  
SHERRIE HALL

Subscribed and sworn to before me this 7<sup>th</sup> day of July 2015.

My Commission Expires:

  
\_\_\_\_\_  
Notary Public



MELANIE WILHELM  
My Commission Expires  
February 28, 2019  
St. Louis County  
Commission #15017667



MELANIE WILHELM  
My Commission Expires  
February 28, 2019  
St. Louis County  
Commission #15017667

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on July 7, 2015, by United States mail, hand-delivery, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie Hall