

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariff to Increase) Case No. ER-2016-0179
its Revenues for Electric Service)

**MOTION TO FILE APPLICATION OF IBEW LOCAL 1439
TO INTERVENE OUT OF TIME**

COMES NOW International Brotherhood of Electrical Workers Local Union 1439, AFL-CIO ("Union"), by counsel, and respectfully moves this Commission for permission to file its application to intervene in this proceeding out of time. In support of this application, Union states:

1. By order dated July 12, 2016 ("Order"), the Commission set July 25, 2016 as the deadline for filing notice of intervention in this matter.
2. Union's counsel has reviewed all her email from that date and she did not receive the Order. During a regular review of the PSC docket, she discovered the notice on today's date, July 26, 2016, after the deadline.
3. The Union's late filing will not prevent it from meeting the other deadlines set forth in the Order.

WHEREFORE, the Union respectfully requests the Commission for permission to file out of time its application for intervention, which is being submitted contemporaneously.

Respectfully submitted,

/s/ Sherrie Hall

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this July 26, 2016.

/s/ Sherrie Hall