

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Union Electric )  
Company d/b/a Ameren Missouri for Permission ) File No. EA-2022-0244  
and Approval and a Certificate of Public Convenience )  
and Necessity Authorizing it to Construct a Renewable )  
Generation Facility. )

**APPLICATION TO INTERVENE OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers (“MIEC”) and submits its Application to Intervene in this proceeding pursuant to 20 CSR 4240-2.075. In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Union Electric Company d/b/a Ameren Missouri.

2. All communications and pleadings in this case should be directed to:

Diana Plescia  
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3. As a representative of the interests of large industrial customers of Union Electric Company d/b/a Ameren Missouri, the MIEC’s interest is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

4. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Application to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

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Attorney for the Missouri  
Industrial Energy Consumers

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 19<sup>th</sup> day of August, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia