BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and Certificates of Public Convenience and Necessity Authorizing it to Construct Renewable Generation Facilities

File No. EA-2023-0286

<u>APPLICATION TO INTERVENE OF</u> 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 Curtis, Heinz, Garrett & O'Keefe, P.C. 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (Fax) dplescia@chgolaw.com

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 Diana M. Plescia #42419 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105 Telephone: (314) 725-8788 Facsimile: (314) 725-8789 E-mail: dplescia@chgolaw.com

> 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 26^{th} day of June, 2023, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia