

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

**IN THE MATTER OF THE UNION)
ELECTRIC COMPANY, d/b/a AMEREN)
MISSOURI'S TARIFFS TO INCREASE)
ITS REVENUES FOR ELECTRIC SERVICE)**

File No. ER-2014-0258

APPLICATION TO INTERVENE FOR

THE CITY OF O'FALLON AND THE CITY OF BALLWIN

COME NOW the City of O'Fallon and the City of Ballwin, (collectively "Applicants"), pursuant to 4 CSR 240-2.075 and 2.080(20) of the Missouri Public Service Commission's Rules of Practice and Procedure, and file their Application to Intervene. For their application, Applicants state as follows:

1. The City of O'Fallon ("O'Fallon") 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. The City of Ballwin ("Ballwin") is a Fourth Class City organized and existing under the laws of the State of Missouri with its principal office located at 14811 Manchester Road, Ballwin, Missouri 63011. Ballwin is located in St. Louis County and has a population of approximately 31,282 residents. Ballwin is a customer of Ameren UE and specifically is a large street lighting customer of Ameren UE.

3. As street lighting customers of Ameren UE, the interests of Applicants are different than those of the general public and may be adversely affected by a final order in this case. Applicants currently have a complaint pending before the Commission regarding

Ameren UE's provision of street lights, which proceeding could be affected by a final order in this case (EC-2014-0316).

4. Applicants have not yet formulated a position regarding the relief sought by Ameren Missouri in this case and reserve their rights to take positions on specific issues as the case proceeds.

5. The intervention by Applicants will serve the public interest by assisting and informing the Commission on certain issues in this case.

6. 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 Applicants in these proceedings, Applicants ask that the Commission grant this Application to Intervene, and thereby entitle Applicants to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and all other respects to be made parties to this proceeding.

Respectfully Submitted,

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

/s/ Leland B. Curtis

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Attorneys for the City of O'Fallon and City of Ballwin,

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 25th day of July, 2014

/s/ Leland B. Curtis _____

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