

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Noranda Aluminum, Inc., et al.,)
)
 Complainants,) File No. EC-2014-0223
)
 Vs.)
)
 Union Electric Company)
 d/b/a Ameren Missouri,)
)
 Respondent.)

**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 the Commission’s February 13, 2014 Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene setting and intervention date of March 7, 2014, and for their Application to Intervene 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 that of the general public and may be adversely affected by a final order in this case.

4. Applicants take no position on Noranda's Excess Earnings Complaint at this time, but reserve their rights to take positions on 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. Applicants states that they have been in discussions with many other cities who are street lighting customers of Ameren UE regarding this intervention, but given the varied meeting times for the City Councils and Boards of Aldermen of other municipalities it has been difficult and cumbersome for the municipalities to become fully informed on the recently filed Ameren UE rate case and to reach formal consensus on interventions without further delaying this filing. Applicants would request leave for additional streetlighting cities to join in the Applicants' intervention by making supplemental filings to intervene no later than March 31, 2014. This request should not prejudice any party to these proceedings.

7. 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 asks 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 4th day of March, 2014

/s/ Leland B. Curtis

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