

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

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(16) Integrated)	
Resource Planning Standard as Required by)	Case No. EO-2009-0247
Section 532 of the Energy Independence and)	
Security Act of 2007)	

**APPLICATION OF UNION ELECTRIC COMPANY, d/b/a AMERENUE
TO INTERVENE**

COMES NOW Union Electric Company, d/b/a AmerenUE (“AmerenUE”), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, AmerenUE states as follows:

1. AmerenUE is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103, and is an electrical corporation, gas corporation and public utility as defined in Section 386.020, RSMo. (2000). AmerenUE is engaged in providing electric and gas services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission (“Commission”). There is already on file with the Commission a certified copy of the Company’s Restated Articles of Incorporation (see, Commission Case No. EO-96-431), a Certificate of Corporate Good Standing (see, Commission Case No. EF-2003-0514), and a copy of the Company’s Fictitious Name Registration as filed with the Missouri Secretary of State’s Office (see, Commission Case No. GO-98-486), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. On December 15, 2008, the Staff of the Commission filed a Motion to Establish a Case, Provide Notice and Schedule a Prehearing Conference.

3. On December 17, 2008, the Commission issued an Order Establishing Cases, Directing Notice, Establishing a Deadline for Submission of Intervention Requests, Setting a Prehearing Conference and Setting Date for Filing Procedural Schedules in one pleading which included Case Nos. EO-2009-0247, EO-2009-0248, EO-2009-0249 and EO-2009-0250.

4. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Wendy K. Tatro
Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149

5. AmerenUE has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates.

6. AmerenUE is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

7. AmerenUE seeks intervention because it believes that it will or may be impacted by the outcome of this proceeding. As an electric utility AmerenUE's interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding.

WHEREFORE, for the foregoing reasons, AmerenUE respectfully requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: /s/ Wendy K. Tatro

Wendy K. Tatro, MBE No. 60261

Associate General Counsel

Ameren Services Company

One Ameren Plaza

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

(314) 554-3484

(314) 554-4014 (FAX)

wtatro@ameren.com

Dated: January 13, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 13th day of January, 2009, served the foregoing Application of Union Electric Company, d/b/a AmerenUE, to Intervene either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

/s/ Wendy K. Tatro

Wendy K. Tatro