BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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> MIDWEST ENERGY CONSUMERS GROUP

COMES NOW, the Midwest Energy Consumers Group, ("MECG") and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumers Group ("MECG") is an incorporated entity representing the interests of large commercial and industrial users of electricity, water, and natural gas throughout the State of Missouri including in the areas served by Ameren Missouri.

2. On June 16, 2023, Ameren Missouri filed its application seeking an order from the Commission granting Certificates of Convenience and Necessity ("CCNs") related to four solar generation facilities. The matters to be considered in this case and the Commission's determinations thereon could have a direct and significant impact on large commercial and industrial customers.

3. As a representative of large user customers of Ameren Missouri, the MECG has a direct and immediate interest in these proceedings that is different from that of the general public. While MECG does not at this time have sufficient information to assert a position in this case, it reserves the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein. 4. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue an order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

<u>/s/ Tim Opitz</u> Tim Opitz, Mo. Bar No. 65082 Opitz Law Firm, LLC 308 E. High Street, Suite B101 Jefferson City, MO 65101 T: (573) 825-1796 tim.opitz@opitzlawfirm.com

ATTORNEY FOR MIDWEST ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 12th day of July 2023:

/s/ Tim Opitz