BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)	
Union Electric Company d/b/a Ameren)	Case No. EO-2012-0146
Missouri for Authority to Sell and)	<u>Case 110. DO 2012 0110</u>
Repurchase Coal and Lease Property.)	

APPLICATION TO INTERVENE OF BARNES-JEWISH HOSPITAL

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital ("BJH" or "Applicant"), hereby applies for leave to intervene in the above-referenced proceeding. In support of this Application, Applicant respectfully states as follows:

- 1. On November 9, 2011 Union Electric Company (d/b/a Ameren Missouri and hereinafter "Ameren Missouri") filed its *Application, Motion for Expedited Treatment and Request for Waiver* and on November 10, 2011, this Commission filed its *Order Directing Notice, Setting Intervention Deadline, Directing Staff Recommendation and Setting an On-the-Record Proceeding* setting November 17 as the deadline for filing intervention applications;
- Applicant operates a not-for profit hospital within the state of Missouri. Over a
 period of many years Applicant has purchased substantial amounts of electricity
 AmerenMissouri as well as utility services from other utility companies in the state of Missouri.
- 3. As a large healthcare customer of Ameren Missouri, Applicant has a direct and immediate interest in these proceedings that is different from that of the general public.

 Therefore, granting this proposed intervention would serve the public interest and would assist the Commission in development of a more complete record.

- 4. BJH does not at this time have sufficient information to assert a position on this case, and it reserves the right to assert positions after it has had an adequate opportunity to examine the record and any documents of other parties filed herein.
- 5. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Lisa C. Langeneckert Sandberg Phoenix & von Gontard P.C. 600 Washington Avenue – 15th Floor St. Louis, MO 63101-1313

WHEREFORE, having stated the grounds for intervention and the interest of Applicant in these proceedings, Applicant asks that the Commission grant this Application to Intervene and be made a party to this proceeding.

SANDBERG PHOENIX & von GONTARD P.C.

By:

Lisa C. Langeneckert, #49781

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CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. <u>EO-2012-0146</u>.

Dated at St. Louis, Missouri this 14th day of November, 2011

Lisa C. Langeneckert

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