

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of Union Electric Company)
d/b/a AmerenUE’s Tariffs to Increase its) File No. ER-2011-0028
Annual Revenues for Electric Service.)

APPLICATION TO INTERVENE FOR
THE CITY OF O’FALLON, THE CITY OF CREVE COEUR, THE CITY OF
UNIVERSITY CITY, THE CITY OF OLIVETTE, THE CITY OF ST. ANN, THE CITY
OF KIRKWOOD, THE CITY OF BELLEFONTAINE NEIGHBORS, THE CITY OF
FLORISSANT, THE CITY OF RICHMOND HEIGHTS, THE VILLAGE OF TWIN
OAKS AND THE ST. LOUIS COUNTY MUNICIPAL LEAGUE

COME NOW the City of O’Fallon, the City of Creve Coeur, the City of University City, the City of Olivette, the City of St. Ann, The City of Kirkwood, The City of Bellefontaine Neighbors, The City of Florissant, The City of Richmond Heights, The Village of Twin Oaks and the St. Louis County Municipal League (collectively “The Municipal Group” or “Applicants”), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and the Commission’s September 7, 2010 *Order Directing Notice, Suspending Tariff, Setting Hearings, and Directing Filing*, and for their Application to Intervene respectfully 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 Creve Coeur (“Creve Coeur”) 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 300 N. New Ballas Road, Creve Coeur, Missouri 63141. Creve Coeur is located in St. Louis County and has a

population of approximately 18,000 residents. Creve Coeur is a customer of Ameren UE and specifically is a street lighting customer of Ameren UE.

3. The City of University City (“University City”) 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 6801 Delmar Boulevard, University City, Missouri 63130. University City is located in St. Louis County and has a population of approximately 37,000 residents. University City is a customer of Ameren UE and specifically a large street lighting customer of Ameren UE.

4. The City of Olivette (“Olivette”) 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 9473 Olive Blvd, Olivette, Missouri 63132. Olivette is located in St. Louis County, Missouri and has a population of approximately 7,438 residents. Olivette is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

5. The City of St. Ann (“St. Ann”) is a Fourth Class City organized and existing under the laws of the State of Missouri with its principal office located at 10405 St. Charles Rock Road, St. Ann, Missouri 63074. St. Ann is located in St. Louis County and has a population of approximately 13,600 residents. St. Ann is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

6. The City of Kirkwood (“Kirkwood”) 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 139 S. Kirkwood Road, Kirkwood, Missouri 63122. Kirkwood is located in St. Louis County and has a population of

approximately 27,324 residents. Kirkwood is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

7. The City of Bellefontaine Neighbors (“Bellefontaine Neighbors”) is a Fourth Class City organized and existing under the laws of the State of Missouri with its principal office located at 9641 Bellefontaine Road, Bellefontaine Neighbors, Missouri 63137. Bellefontaine Neighbors is located in St. Louis County and has a population of approximately 11,088 residents. Bellefontaine Neighbors is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

8. The City of Richmond Heights (“Richmond Heights”) 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 1330 S. Big Bend Blvd. Richmond Heights, Missouri 63117. Richmond Heights is located in St. Louis County and has a population of approximately 9,600 residents. Richmond Heights is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

9. The City of Florissant (“Florissant”) 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 955 Rue St. Francois, Florissant, Missouri 63031. Florissant is located in St. Louis County and has a population of approximately 54,536 residents. Florissant is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

10. The Village of Twin Oaks (“Twin Oaks”) is a Village organized and existing under the laws of the State of Missouri with its principal office located at 1393 Big Bend Road, Twin Oaks, Missouri 63021. Twin Oaks is located in St. Louis County and has a population of

approximately 362 residents. Twin Oaks is a customer of Ameren UE and specifically a street lighting customer of Ameren UE.

11. The St. Louis County Municipal League (“Municipal League”) is a 501(c)(4) not for profit organization organized and existing under the laws of the State of Missouri with its principal office located at 121 S. Meramec Avenue, Clayton, Missouri 63105. The Municipal League has in its membership eighty-nine (89) of the 91 municipalities in St. Louis County as well as St. Louis County and the City of St. Louis. While the Municipal League cannot at this time commit to the intervention of each and every one of its members (See paragraph 15 below), the Municipal League’s intervention in this case will enable and assist it in keeping its members fully apprised of the proceedings in this case.

12. As street lighting customers of Ameren UE the interests of The Municipal Group are different than that of the general public and may be adversely affected by a final order in this case.

13. The Municipal Group generally opposes the increase proposed for street lighting in this case, but reserves its rights to take positions on other specific issues as the case proceeds.

14. The intervention by The Municipal Group will serve the public interest by assisting and informing the Commission on certain issues in this case.

15. The Municipal Group 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. The Municipal Group would request leave for additional streetlighting cities

to join in the Municipal Group's intervention by making supplemental filings to intervene no later than October 29, 2010. This request should not prejudice any party to these proceedings.

16. Municipalities are facing serious budget difficulties due to the recession's impact on tax revenues. Street lighting is intrinsically linked to public safety which is a high priority for all municipalities. The Municipal Group wants to be satisfied that Ameren UE's street lighting rates are fair and reasonable for all concerned.

17. Correspondence and communications regarding this application, including service of all notices and orders of this Commission should be addressed to:

Leland B. Curtis
Carl J. Lumley
Kevin M. O'Keefe
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789
lcurtis@lawfirmemail.com
clumley@lawfirmemail.com
kokeefe@lawfirmamil.com

WHEREFORE, having stated the grounds for intervention and the position and interests of The Municipal Group in these proceedings, The Municipal Group asks that the Commission grant this Application to Intervene, and thereby entitle The Municipal Group 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

Leland B. Curtis, #20550
Carl J. Lumley, #32869
Kevin M. O'Keefe, #23381
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
Email: lcurtis@lawfirmemail.com
clumley@lawfirmemail.com
kokeefe@lawfirmemail.com

Attorneys for the City of O'Fallon, City of Creve Coeur,
City of University City, City of Olivette, City of St. Ann, City of
Kirkwood, City of Bellefontaine Neighbors, City of Richmond
Heights, City of Florissant, Village of Twin Oaks and St. Louis
County Municipal League
("The Municipal Group")

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed
persons listed on the attached list on the 23rd day of September, 2010.

/s/ Leland B. Curtis

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov

Office of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, Mo 65102
opcservice@ded.mo.gov

Nathan Williams
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
Nathan.williams@psc.mo.gov

James Lowery
Union Electric Company
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
lowery@smithlewis.com

Thomas Byrne
Union Electric Company
1901 Chouteau Avenue
P.O. Box 66149 (MC1310)
St. Louis, MO 63166-6149
AmerenUEService@ameren.com

Wendy Tatro
Union Electric Company
1901 Chouteau Ave.
St. Louis, MO 63166-6149
AmerenUEService@ameren.com

Michael R. Tripp
Union Electric Company
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
tripp@smithlewis.com

Mary L. Hoyt
Union Electric Company
1901 Chouteau Ave.
St. Louis, MO 63166-6149
AmerenUEService@ameren.com

Russell L. Mitten
P.O. Box 456
312 E. Capitol Ave.
Jefferson City, MO 65102
rmitten@brydonlaw.com

Mark W. Comley
Charter Communications Entertainment I, LLC
P.O. Box 537
601 Monroe St. Ste. 301
Jefferson City, MO 65102
comleym@ncrpc.com

Lisa Langeneckert
Missouri Energy Group
600 Washington Ave. 15th Floor
St. Louis, MO 63101
llangeneckert@sandbergphoenix.com

Stephanie S. Bell
Missouri Retailers Association
308 E. High St. Ste. 301
Jefferson City, MO 65101
sbell@blitzbardgett.com

Thomas R. Schwarz
Missouri Retailers Association
308 E. High St. Ste. 301
Jefferson City, MO 65101
tschwarz@blitzbardgett.com

Cheryl L. Lobb
Union Electric Company
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
lobb@smithlewis.com