

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Request for a)
Variance from the Triennial Filing Date) Case No. EE-2022-0243
Requirement Found in 20 CSR 4240-22.080)

**APPLICATION TO INTERVENE OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and submits its Application to Intervene in this proceeding pursuant to 4 CSR 4240-2.075. In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Union Electric Company d/b/a Ameren Missouri ("Ameren").

2. As a representative of the interests of large industrial customers of Ameren, the MIEC's interest is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

3. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Application to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 15th day of March, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia