

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Permission and Approval and a Certificate)
of Public Convenience and Necessity) Case File No.: EA-2019-0021
Authorizing it to Construct a Wind Generation)
Facility.)

**APPLICATION TO INTERVENE
OF ATCHISON COUNTY, MISSOURI**

COMES NOW Atchison County, Missouri by and through the County Commission composed of Presiding Commissioner Curtis Livengood, and North District Associate Commissioner James Quimby, and South District Associate Commissioner Richard Burke (collectively referred to hereafter as “Atchison County”), by and through its counsel Ivan L. Schraeder, of counsel to The Wagner Law Group, and pursuant to 4 CSR 240-2.075, applies to intervene in the above case. For its Application, Atchison County states:

1. Atchison County, Missouri is a political subdivision created under the laws of Missouri as a third class county with its principal place of business located at 400 S. Washington Street, Rock Port, MO 64482.
2. Atchison County, Missouri is represented by counsel identified below in this pleading.
3. Atchison County, Missouri is interested in this litigation because any decision issued in this matter may serve to reduce general revenue payable to the County from taxes that are now payable for the subject properties that may be lost by virtue of changes requested by Petitioner, such reduction in tax revenues will have a permanent and direct adverse impact on County operations and the services provided to the citizens of Atchison County, Missouri.

4. Atchison County, Missouri opposes the relief sought by the Petitioner as it is currently requested.

WHEREFORE, Atchison County respectfully requests that the Commission grant this Application to Intervene, along with any further relief the Commission deems just and proper.

Respectfully submitted by:

/s/ Ivan L. Schraeder

Ivan L. Schraeder, MoBAR No. 35383

Of Counsel

The Wagner Law Group

25 West Moody Avenue

St. Louis, Missouri 63119

314.236.0065 *telephone*

314.236.5743 *facsimile*

ischraeder@wagnerlawgroup.com

Counsel for Atchison County, Missouri

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a true and correct copy of the foregoing to be served this 1st day of November, 2018, on all counsels of record as follows:

Missouri Public Service Commission
Staff Counsel Department
200 Madison Street, Suite 800
PO Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
Marc Poston
200 Madison Street, Ste.
650
PO Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

County of Atchison, Missouri
County Commission
400 S. Washington
PO Box 280
Rock Port, MO 64482
acclerk@atcomo.org

The Empire District Electric Company
Legal Department
602 S. Joplin Avenue
PO Box 127
Joplin, MO 64802

Midwest Energy Consumers Group
Legal Department
807 Winston Court
Jefferson City, MO 65101

Missouri Coalition for the Environment
Legal Department
6267 Delmar
St. Louis, MO 63130

Missouri Department of Conservation
Legal Department
2901 W Truman Blvd
PO Box 180
Jefferson City, MO 65102

Missouri Division of Energy
Legal Department
301 W High St., Room 720
PO Box 1766
Jefferson City, MO 65102

Missouri Industrial Energy Consumers (MIEC)
Legal Department
211 N. Broadway, Ste. 3600
St. Louis, MO 63102

Missouri Joint Municipal Electric Utility Commission
Legal Department
1808 Interstate 70 Drive SW
Columbia, MO 65203

Missouri Public Service Commission
Nicole Mers
200 Madison Street, Ste
800
PO Box 360
Jefferson City, MO 65102
nicole.mers@psc.mo.gov

National Association for the Advancement of Colored People
Legal Department
4805 Mt. Hope Drive
Baltimore, MD 21215

Natural Resources Defense Council
Legal Department
20 North Wacker Drive, Ste.
1600
Chicago, IL 60606

Renew Missouri
Tim Opitz
409 Vandiver Dr. Bldg 5
Suite 205
Columbia, MO 65201
tim@renewmo.org

Sierra Club
Legal Department
2101 Webster St., Ste. 1300
Oakland, CA 94612

Union Electric Company

Paula Johnson
1901 Chouteau Avenue
St. Louis, MO 63103
amerenmoservice@ameren.com

Union Electric Company

James B. Lowery
111 South 9th St., Ste. 200
PO Box 918
Columbia, MO 65205-
0918
lowery@smithlewis.com

Union Electric Company

Wendy Tatro
1901 Chouteau Avenue
St. Louis, MO 63103-6149
amerenmoservice@ameren.com

Wind on the Wires

Legal Department
570 Asbury St., Suite 201
St. Paul, MN 55104
info@windonthewires.org

/s/ Ivan L. Schraeder
