BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In Re Union Electric Company's 2008 Utility)	
Resource Filing pursuant to 4 CSR 240 -)	Case No. EE-2010-0243
Chapter 22.)	

APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch Companies, Inc., BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, Monsanto, Pfizer, Precoat Metals, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Saint Gobain, Solutia and U.S. Silica Company (referred to herein as the Missouri Industrial Energy Consumers or "MIEC) and, pursuant to 4 C.S.R. 240-2.075 and the Commission's March 1, 2010 *Order Providing Notice, Establishing Intervention Deadline and Directing Response* in this case, file their application to intervene. This application is filed on behalf of the above-mentioned companies as individual entities and is also filed on behalf of the MIEC as an association. For their application, the MIEC and its individual members state as follows:

- 1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Union Electric Company d/b/a AmerenUE ("AmerenUE").
- 2. As large industrial customers of AmerenUE, the interests of the MIEC and each of its members are different than that of the general public and may be adversely affected by a final order arising from this case.
- 3. The MIEC and its members oppose the relief sought by AmerenUE in this case, and reserve the right to take positions on specific issues as this case proceeds.
- 4. Intervention by the MIEC and its members will serve the public interest by assisting the Commission's record for decision in this case.

WHEREFORE, Anheuser-Busch Companies, Inc., BioKyowa, The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, Monsanto, Noranda Aluminum, Pfizer, Precoat Metals, Procter & Gamble Company, Nestlé Purina PetCare, Saint Gobain, Solutia and U.S. Silica Company respectfully request that they be permitted to intervene individually and as members of the MIEC, and that they be made parties to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 2nd day of March, 2010, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke	
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