BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Tariffs to Adjust Its)	File No. GR-2021-0241
Revenues for Natural Gas Service.)	

APPLICATION TO INTERVENE OF THE MIDWEST ENERGY CONSUMERS GROUP

COMES NOW the Midwest Energy Consumers Group ("Applicant" or "MECG"), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

- 1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of natural gas.
- 2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on Applicant's cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicant would serve the public interest and would assist the Commission in development of a more complete record.
- 3. As large user customers of Ameren Missouri, the Applicant has a direct and immediate interest in these proceedings that is different from that of the general public. While Applicant does not at this time have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including

service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall Woodsmall Law Office 308 East High Street, Suite 204 Jefferson City, MO 65101

interest of the Applicant in these proceedings, Applicant asks that the Commission grant

WHEREFORE, having stated the grounds for intervention and the position and

this Application for Intervention, and thereby entitle said Applicant to have notice of and

to appear at the taking of testimony, to produce and cross-examine witnesses, and to be

heard through counsel on the argument, and in all other respects to be made parties to this

proceeding.

Respectfully submitted,

David L. Woodsmall, MBE #40747

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ATTORNEY FOR THE MIDWEST ENERGY CONSUMERS GROUP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

David L. Woodsmall

Dated: April 2, 2021