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

In the Matter of Missouri-American Water	)	
Company's Request for Authority to	)	
Implement a General Rate Increase for Water	)	File No. WR-2017-0285
and Sewer Service Provided In	)	
Missouri Service Areas.	)	
In the Matter of Missouri-American Water	)	
Company's Request for Authority to	)	
Implement a General Rate Increase for Water	)	File No. SR-2017-0286
and Sewer Service Provided In	)	
Missouri Service Areas	)	

#### AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) pursuant to 4 CSR 240-2.075, and for its Application for Intervention in this case, states as follows:

- 1. Ameren Missouri is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission (Commission). There is already on file with the Commission a certified copy of the Company's Articles of Incorporation (See Commission Case. No. EA-87-105), a Certificate of Corporate Good Standing (See Case No. EA-2015-0273), and a copy of the Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See Case No. EN-2011-0069), and said documents are incorporated herein by reference and made a part hereof for all purposes.
- 2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel as well as to:

Thomas Byrne
Senior Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue (MC 1450)
St. Louis, MO 63103
TByrne@ameren.com

- 3. Ameren Missouri's interest in this case arises from its status as a customer as well as a Commission-regulated investor-owned electric utility with a specific interest in some of the key regulatory mechanisms at issue in this case, including Missouri-American Water Company's ("MAWC") requests to employ a forward test year, to utilize a Rate Stabilization Mechanism, and to obtain accounting authority with respect to certain investments. The Commission's consideration of such issues could, as a practical matter, have an impact upon similar issues as they arise in Ameren Missouri cases or other proceedings at the Commission, which in turn could have an impact on Ameren Missouri's business, making Ameren Missouri's interests different than the interests of the general public. Moreover, Ameren Missouri's intervention is in the public interest as it may aid the Commission in addressing the policy implications of such issues.
- 4. At this early juncture of the case, Ameren Missouri has not determined its position on the issues in this case.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

# Respectfully Submitted,

## /s/ James B. Lowery

James B. Lowery, #40503 SMITH LEWIS, LLP P. O. Box 918 Columbia, Missouri 65201 (573)-443-3141 (Telephone) (573-442-6686 (Facsimile) lowery@smithlewis.com

Wendy K. Tatro, #60261 Director - Assistant General Counsel 1901 Chouteau Avenue, MC-1310 St. Louis, Missouri 63103 (314) 554-3484 (Telephone) (314) 554-4014 (Facsimile) AmerenMOService@ameren.com

## ATTORNEYS FOR AMEREN MISSOURI

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this  $25^{th}$  day of July, 2017.

<u>/s/ James B. Lowery</u> James B. Lowery