

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

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File Tariffs)	
Increasing Rates for Natural Gas Service)	Case No. GR-2010-0363
Provided to Customers in the Company's)	
Missouri Service Area.)	

**AMERENUE'S SUGGESTIONS IN OPPOSITION TO THE
APPLICATION TO INTERVENE OF MOGAS PIPELINE LLC**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), by and through counsel, and in response to the Application to Intervene for MoGas Pipeline LLC filed herein on July 2, 2010, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. Pursuant to Commission Rule 240-2.075(2), an application to intervene must "...state the proposed intervenor's interest in the case and reasons for seeking intervention..." In its Application to Intervene, however, MoGas Pipeline LLC ("MoGas") simply states that AmerenUE is a shipper on the MoGas pipeline system and cites to an AmerenUE affidavit which refers to AmerenUE's contract with MoGas. The Application to Intervene therefore fails to state MoGas' interest in the case and/or the reasons MoGas is seeking intervention.

2. Importantly, it should be recognized that MoGas is not a customer of AmerenUE's natural gas operations. AmerenUE purchases transportation from MoGas pursuant to a contract and under tariff sheets subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC").

3. Further, the rates at issue in this case do not include AmerenUE's Purchased Gas Adjustment ("PGA") rates or the contract between AmerenUE and MoGas. The PGA rates are established in a separate proceeding. In this case, AmerenUE has asked for modification of the structure of its PGA mechanism, but not to the dollar amounts collected through that mechanism.

Additionally, these modifications will not impact MoGas or the rate AmerenUE pays MoGas. Accordingly, MoGas' Application to Intervene fails to comply with Commission Rule 240-2.075(2) and should be denied by the Commission.

4. Pursuant to Commission Rule 240-2.075(4), the Commission may grant an intervention request only when: (A) the proposed intervenor has an interest which is different from that of the general public *and* which may be adversely affected by a final order arising from the case; or (B) granting the proposed intervention would serve the public interest. MoGas has failed to make either required showing. First, in its Application to Intervene, MoGas does not allege that the granting of its request would serve the public interest. Indeed, the public interest may be harmed if MoGas uses this intervention to obstruct this case in an attempt to gain leverage in the pending lawsuit¹ arising out of the Commission's final order in GC-2006-0491.

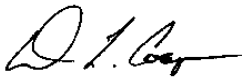
5. Second, although MoGas does assert that its interests are different from those of the general public, it provides no basis for this claim and in fact fails to even allege that its interests may be adversely affected by a final order in the case. Instead, MoGas points to the fact that it is mentioned in the rate case testimony. The mere fact that AmerenUE's rate case testimony mentions MoGas as a natural gas pipeline on which the Company transports natural gas is not sufficient to provide a basis for its intervention in this case. As stated above, MoGas is not a natural gas customer of AmerenUE and so arguably has less of an interest in this proceeding than does the general public. On this point, AmerenUE is unable to contemplate any facts or circumstances which could lead to a final order in this case having any adverse affect on MoGas. Accordingly, MoGas' Application to Intervene fails to comply with Commission Rule 240-2.075(4) and should be denied by the Commission.

¹ AmerenUE v. MoGas Pipeline, LLC, Circuit Court of Cole County, Case No. 09AC-CC00398. In this case, the Commission found that MoGas' predecessor companies were overcharging AmerenUE (and other customers) in

6. AmerenUE is aware of the Commission's sometimes past practice of liberally granting intervention requests. Any such practice, however, cannot overcome the woeful inadequacies of MoGas' Application to Intervene in this case. MoGas has failed to provide any support for its intervention request, and the granting of such a request by the Commission would be unlawful and unreasonable.

WHEREFORE, AmerenUE respectfully files these Suggestions in Opposition and requests an order of this Commission denying the Application to Intervene for MoGas Pipeline LLC. AmerenUE requests such other and further relief as the Commission deems just and proper under the circumstances.

Respectfully submitted,



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violation of their tariffs. This lawsuit seeks a refund of AmerenUE's share of the amounts the Commission found to be overcharged.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to all counsel of record on this 12th day of July, 2010.

