

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

In the Matter of the Requests for Customer Account Data Production. )  
 ) File No. EO-2024-0002

**AMEREN MISSOURI'S APPLICATION TO INTERVENE**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and pursuant to 20 CSR 4240-2.075 and the Commission’s *Order Directing Notice, Setting Deadline for Intervention Requests, and Setting Prehearing Conference* issued July 6, 2023 in the above-captioned case (the “*Order*”), hereby files this *Application to Intervene*. In support of its *Application to Intervene*, Ameren Missouri states as follows:

1. On June 30, 2023, Evergy Metro, Inc. d/b/a Evergy Missouri Metro (“EMM”) and Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“EMW”) (collectively, “Evergy”) filed its *Motion to Establish Docket for Further Consideration of Data Production (“Evergy’s Motion”)*.

2. On July 6, 2023, the Commission issued the *Order* directing “[a]ny person wishing to intervene in this matter [to] file an application to intervene no later than July 27, 2023.” *Order*, at ordering paragraph 7.

3. 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 File No. EA-87-105), a Certificate of Corporate Good Standing (See File No. EA-2022-0245), and a copy of the Company’s Fictitious Name Registration

as filed with the Missouri Secretary of State's Office (See File No. EN-2011-0069), and said documents are incorporated herein by reference and made a part hereof for all purposes.

4. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel and to:

Steve Wills  
Director, Regulatory Affairs  
Ameren Missouri  
1901 Chouteau Avenue (MC 1450)  
St. Louis, MO 63103  
[swills@ameren.com](mailto:swills@ameren.com)

5. Ameren Missouri has an interest in this case to efficiently address data availability issues. As described by Evergy in paragraph 9 of its *Motion* to establish this docket:

On June 14, 2023, the Commission issued its Report and Order (“Ameren Missouri Order”) in ER-2022-0337 and ordered on p. 48 that Ameren Missouri [] prepare a study of customer specific information by account, rate schedule and voltage by its next rate case. Many aspects of the data ordered for this study are similar to the data requested by Staff from Evergy. Evergy believes it would be more efficient to include Ameren Missouri in the requested EO-docket so that the Commission and Staff can address the issue of data availability in one proceeding.

6. Ameren Missouri's interests are different than the interests of the general public, and such interests may be negatively or positively impacted by a final order arising from this case regarding provision of detailed data. Ameren Missouri's intervention is in the public interest to efficiently address data availability issues in one proceeding.

7. 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/ Jermaine Grubbs*

**Jermaine Grubbs**, MO Bar #68970

Corporate Counsel

**Wendy K. Tatro**, MO Bar #60261

Director and Asst. General Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

Telephone: (314) 554-2041

Facsimile: (314) 554-4014

[jgrubbs@ameren.com](mailto:jgrubbs@ameren.com)

[amerenservice@ameren.com](mailto:amerenservice@ameren.com)

**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of July, 2023, a copy of the foregoing filing was served, via e-mail, on counsel for the Missouri Public Service Commission Staff, the Office of the Public Counsel, all parties of record, as well as entities who have sought to intervene in File No. ER-2022-0337.

*/s/ Jermaine Grubbs*

Jermaine Grubbs