

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

In the Matter of Ameren Missouri's 2017)	
Utility Resource Filing Pursuant to)	Case No. EO-2018-0038
4 CSR 240- Chapter 22)	

**REPLY OF THE
MISSOURI JOINT MUNICIPAL ELECTRICAL UTILITY COMMISSION TO
AMEREN MISSOURI'S OBJECTION TO APPLICATION FOR INTERVENTION**

COMES NOW, the Missouri Joint Municipal Electrical Utility Commission ("MJMEUC"), pursuant to Missouri Public Service Commission ("Commission") rule 4 CSR 240-2.075, and in reply to Ameren Missouri's ("Ameren") Objection to MJMEUC's Application to Intervene, MJMEUC states as follows:

1. Ameren owns significant transmission and distribution assets in the State of Missouri. Those transmission and distribution assets are under the jurisdiction of the Commission.

2. Many MJMEUC member cities are embedded in Ameren's retail service territory in Missouri. These cities depend on Ameren Missouri transmission and distribution assets to transmit electricity to their cities in a reliable and cost effective manner.

3. Ameren's objection implies that if you are not a retail customer of Ameren, then you are not affected by their resource planning. However, the decisions that Ameren makes in its resource planning activities have the potential to negatively impact a wide range of stakeholders beyond just retail customers. The choices of what resources to utilize affects the type and location of transmission projects or transmission upgrades that are built. In turn, this affects transmission and distribution customers like MJMEUC and its members, sometimes negatively. It is also important to note that transmission service customers like MJMEUC and its member cities pay for those transmission and distribution projects or upgrades. The concept that

MJMEUC and its members are not adversely affected by Ameren's decisions regarding its selection of resources is not supported by the facts.

4. MJMEUC and its members are directly affected by changes made to Ameren Missouri's transmission and distribution systems, both as to reliability and paying just and reasonable rates.

5. The Commission recognizes that transmission and distribution issues are important in the resource planning process, and includes a section in its resource planning rules for transmission and distribution.¹

WHEREFORE, MJMEUC requests that it be permitted to intervene and be made a party to this case for all purposes, and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

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¹ Commission Rule 4 CSR 240-22.045, *Transmission and Distribution Analysis*.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 26th day of October, 2017, to all parties on the Commission's service list in this case.

/s/ Terry M. Jarrett