

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission and)
Approval and a Certificate of Public Convenience and)
Necessity Under 4 CSR 240-3.105.) File No. **EA-2019-0181**

APPLICATION TO INTERVENE
OF THE WESTERN MISSOURI & KANSAS LABORERS DISTRICT COUNCIL

COMES NOW the Western Missouri & Kansas Laborers District Council (“WMKLDC”) and its affiliated local unions in Missouri, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in above-captioned case, which was initiated on May 15, 2019 by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) when it filed its request for a certificate of convenience and necessity (“CCN”) for permission to construct, own, and operate a wind generation facility in Atchison County, Missouri.

In support of this application, WMKLDC states as follows:

1. The WMKLDC is headquartered at 8500 Ward Parkway, Suite 300, Kansas City, Missouri 64114, and is an affiliate council of the Laborers International Union of North America (“LiUNA”), one of strongest unions in the country. Laborers are construction workers, government workers, health care providers, industrial employees, service workers, and educators. Members of WMKLDC reside and work throughout Missouri, including within Atchison County, Missouri and surrounding areas. Those members have an interest in employment opportunities in the region for the proposed

construction project that is the subject of this case. These interests of WMKLDC and of its union members in this case are unique and different than the general public interest.

2. On May 15, 2019, the very same day that this case was initiated, Commission issued its “Order Directing Notice, Adding Parties, and Setting Deadline for Intervention Requests” setting a 10-day intervention deadline of May 25, 2019. WMKLDC’s request for intervention is timely.

3. Correspondence, communications, orders and the decision in this matter should be addressed to:

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5. WMKLDC work like to offer its technical assistance and labor perspective in further developing the official record of this case. WMKLDC believes that its intervention and participation in this proceeding would serve the public interest, and it wishes to become a party to this case for all purposes.

WHEREFORE, WMKLDC respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for WMKLDC

Dated: May 25, 2019

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list of this case at the Missouri Public Service Commission, including the following, on this 25th day of May 2019:

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