

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

In the Matter of the Cancellation of the Certificate of)
Convenience and Necessity Originally Approved in) File No. ED-2019-0309
File No. EA-2005-0180 and the LTS Rate Schedule)

**APPLICATION TO INTERVENE OF
THE MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW the Midwest Energy Consumers Group (“Applicants” or “MECG”), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and the Commission’s April 12, 2019 *Order Directing Notice, Establishing Time to Intervene, and Directing Staff Recommendation*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity in the service areas of Missouri public utilities including Ameren Missouri.

2. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on Applicants’ cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record.

3. As large user customers of Ameren Missouri, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. To this point, MECG has been granted intervention in Ameren’s last several rate proceedings. While Applicants do not at this time have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had

an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall
Woodsmall Law Office
308 East High Street, Suite 204
Jefferson City, MO 65101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants to have notice of and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

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ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

David L. Woodsmall

Dated: April 19, 2019