

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Staff's Investigation of)
Matters Concerning the Rush Island Energy)
Center Belonging to Union Electric Company) File No. EO-2022-0215
d/b/a Ameren Missouri)

APPLICATION TO INTERVENE OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and submits its Application to Intervene in this proceeding pursuant to 20 CSR 4240-2.075. In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Rush Island Energy Center. ("Rush Island").

2. All communications and pleadings in this case should be directed to:

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3. As a representative of the interests of large industrial customers of Rush Island, the MIEC's interest is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

4. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, the MIEC respectfully requests that the Commission grant this Application to Intervene together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia

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Attorney for the Missouri
Industrial Energy Consumers

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this ____ day of March, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia