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 an Accounting Authority Order to)	Case No. EU-2021-0027
Record and Preserve Net Costs and)	
Revenues Related to COVID-19)	

MECG APPLICATION TO INTERVENE

COMES NOW the Midwest Energy Consumers Group ("MECG"), pursuant to 20 CSR 4240-2.075 and the Commission's October 19, 2020 *Order Directing Notice and Setting Deadline for Intervention Applications*, and for its Application to Intervene in this case, states as follows:

- 1. On October 16, 2020, Union Electric Company d/b/a Ameren Missouri ("Ameren") applied for an accounting authority order permitting it to track and defer in a regulatory asset all incremental costs and other financial impacts related to the COVID-19 pandemic.
- 2. Midwest Energy Consumers Group ("MECG") is an incorporated entity representing the interests of large commercial and industrial utility customers including those served by Ameren.
- 3. MECG's intervention will serve the public interest by assisting the record for the Commission's decision in this case.
- 4. Correspondence or 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 E. Capital, Suite 204 Jefferson City, Missouri 65101 Voice: (573) 797-0005

E-mail: david.woodsmall@woodsmalllaw.com

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

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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.

_____/s/ David Woodsmall
David L. Woodsmall

Dated: October 19, 2020