

**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 Convenience and	)	File No. EA-2019-0021
Necessity Authorizing it to Construct a Wind	)	
Generation Facility	)	

**APPLICATION TO INTERVENE OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers or “MIEC” and, pursuant to 4 C.S.R. 240-2.075, and the Commission’s October 22, 2018 *Order Directing Notice, Setting Intervention Deadline, and Scheduling a Procedural Conference*, files its Application to Intervene. In support of its Application, the MIEC states as follows:

1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of Ameren Missouri.

2. As a representative of large industrial customers of Ameren Missouri, the MIEC’s interest is different than that of the general public and may be adversely affected by a final order arising from this case.

3. The MIEC may or may not oppose the relief sought by Ameren Missouri in this case, and reserves the right to take positions on specific issues as this case proceeds.

4. The MIEC’s intervention will serve the public interest by assisting the Commission’s record for decision in this case.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

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By: /s/ Lewis Mills

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Attorneys 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 2nd day of November, 2018, to all parties on the Commission's service list in this case.

/s/ Lewis Mills