BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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)
Authorizing it to Construct a Wind Generation)
Facility.)
)

Case File No.: EA-2019-0021

ROCK PORT R-2 SCHOOL DISTRICT'S APPLICATION TO INTERVENE

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COMES NOW the Board of Education of the Rock Port R-2 School District ("Rock Port R-2" or "the District"), by and through its counsel Tueth Keeney Cooper Mohan & Jackstadt, P.C. and pursuant to 4 CSR 240-2.075, applies to intervene in the above case. For its Application, Rock Port R-2 states:

1. Rock Port R-2 is a political subdivision created under the laws of Missouri as a

seven-director school district located in Atchison County, Missouri.

- 2. The District is represented by counsel identified below in this pleading.
- 3. Rock Port R-2 receives revenue from the assessment of state and local taxes.

4. The District is interested in this litigation because any decision issued in this matter may serve to reduce general revenue payable to the District from taxes that are now payable for the wind power properties that may be lost by virtue of changes requested by Petitioner, such reduction in tax revenues will have a permanent and direct adverse impact on District operations and the services provided to students of Rock Port R-2.

5. Rock Port R-2 opposes the relief sought by the Petitioner as it is currently requested.

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WHEREFORE, Rock Port R-2 respectfully requests that the Commission grant this

Application to Intervene, along with any further relief the Commission deems just and proper.

Respectfully submitted,

TUETH KEENEY COOPER MOHAN & JACKSTADT, P.C.

By: <u>/s/ Amy Clendennen</u>

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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/ Amy Clendennen