

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
AmerenUE for Authority to File Tariffs Increasing) Case No. ER-2008-00318
Rates for Electric Service Provided to Customers in)
the Company's Missouri Service Area.)

**THE COMMERCIAL GROUP'S
APPLICATION TO INTERVENE**

Pursuant to 4 CSR 240-2.075(1) The Commercial Group submits this Application To Intervene ("Application") to the Public Service Commission of the State of Missouri (the "Commission"). In support of this Application, The Commercial Group states as follows:

1. On April 4, 2008, the Union Electric Company d/b/a AmerenUE filed its application with the Commission seeking authority to implement a general rate increase for electric service within its Missouri service territory.

2. The Commercial Group is an unincorporated, voluntary association of large commercial users of electricity in AmerenUE's Missouri service territory. The Commercial Group was formed for the purpose of economically representing the interests of its members in this proceeding. The membership of The Commercial Group is not yet finalized. Current members are JCPenney Corporation and Wal-Mart Stores East, LP. It is anticipated that other similarly situated customers of AmerenUE will subsequently be added to The Commercial Group. Any such additions will be identified and will not delay this case or adversely impact the rights of other parties to the case.

3. Collectively members of The Commercial Group operate numerous large retail stores and other facilities throughout AmerenUE's Missouri service territory, purchasing large amounts of electricity from AmerenUE. The proposal filed by

AmerenUE in this proceeding, if adopted, will significantly increase the cost of electricity to members of The Commercial Group, directly and substantially affecting their business and operations in the State of Missouri. Accordingly, The Commercial Group has a direct interest in these proceedings.

4. Further, as large commercial customers of AmerenUE, the interests of The Commercial Group differ significantly from those of other customer groups represented in this proceeding. The interests of The Commercial Group cannot be adequately represented by any existing or future participant in these proceedings given the unique nature of its members' interests. Allowing The Commercial Group to intervene in this proceeding will serve the public interest by ensuring that the Commission is apprised of the interests of large commercial electric customers. Further because members of The Commercial Group operate in many different states, they have substantial and unique insights gained in various states and markets regarding issues in this proceeding, including those such as customer class costs of service and rate design.

5. The Commercial Group continues to review the filing of AmerenUE, especially the rate design and cost of service components, and may support or seek changes to various aspects of the filing. For purposes of 4 CSR 240-2.075(2), at present The Commercial Group is unsure of the position it will take in this matter.

6. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

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WHEREFORE, The Commercial Group respectfully requests that this Application be granted and that it be provided full rights to participate immediately as a party to this proceeding.

Dated this 28th day of April, 2008.

Respectfully submitted,

By _____
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ATTORNEYS FOR THE COMMERCIAL
GROUP

CERTIFICATE OF SERVICE

The undersigned certifies that on April 28, 2008, a true and correct copy of the foregoing Application to Intervene was served by U.S. mail, postage prepaid, or by electronic mail addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.
