

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariff to Increase) Case No. ER-2016-0179
its Revenues for Electric Service)

VERIFIED APPLICATION OF IBEW LOCAL 1439 TO INTERVENE

COMES NOW International Brotherhood of Electrical Workers Local Union 1439, AFL-CIO ("Union"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, the Union states:

1. This matter involves an application filed by Union Electric Company d/b/a Ameren Missouri ("Ameren") requesting a general rate increase.
2. The Union is a labor organization that represent a large number of non-managerial, maintenance employees at a variety of Ameren's Missouri facilities.
3. The Union is an unincorporated association. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, the Union does not have evidence of any such registration. The Union may be contacted at the address and telephone number listed here:

Michael D. Walter
Business Manager
IBEW Local 1439
2121 59th Street
St. Louis MO 63110
(314) 644-6111

4. Though the Union is an "association," it does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) is directed. It does not appear to be the intent of those regulatory subsections for the Union to file a list of all

of its members, and the Union hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that the Union must comply with the subsection, the required list will be tendered immediately.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Sherrie A. Hall, MBN 40949
Emily R. Perez, MBN 62537
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
sahall@hammondshinners.com (E-mail)
eperez@hammondshinners.com (email)

6. The Union does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. The Union does not have any annual reports or assessment fees that are overdue.

8. The Union seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representatives of certain of Ameren's non-managerial, non-professional employees, the Union and the employees it represents have interests in this proceeding which are clearly different from those of Ameren, the general public, or any other party. Where the public's interests here are concentrated in the safe and dependable delivery of electricity at a reasonable cost, the Union and the employees it represents are additionally concerned with the impact the proposed general rate increase could have on jobs, pensions, and other terms and

conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

10. No other party to this proceeding can adequately represent the additional, legitimate concerns of the Union and the employees it represents here.

WHEREFORE, the Union respectfully asks the Commission to grant this application and to permit the Union to intervene here.

Respectfully submitted,

/s/ Sherrie A. Hall

SHERRIE A. HALL, MBN 40949

EMILY R. PEREZ, MBN 62537

HAMMOND and SHINNERS, P.C.

7730 Carondelet Avenue, Suite 200

St. Louis, Missouri 63105

(314) 727-1015 (Telephone)

(314) 727-6804 (Fax)

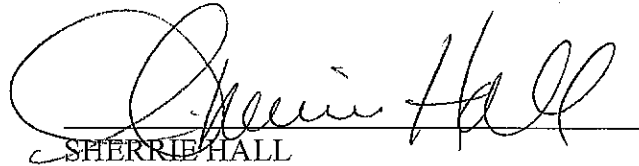
sahall@hammondshinners.com (email)

eperez@hammondshinners.com (email)

Attorneys for IBEW Local Union 1439

VERIFICATION

COMES NOW Sherrie Hall and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Hall further states that she has been authorized to sign and file this application on behalf of the Union.



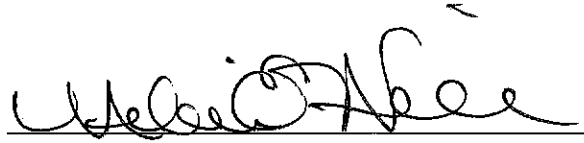
SHERRIE HALL

Subscribed and sworn to before me this th26 day of July, 2016.

My Commission Expires:



MELANIE WILHELM
My Commission Expires
February 28, 2019
St. Louis County
Commission #15017667



Notary Public

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on July 26, 2016, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie Hall _____