

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

Missouri Industrial Energy Consumers, et al.	)	
Complainants,	)	
	)	
v.	)	Case No. EC-2016-0199
	)	
Union Electric Company, d/b/a Ameren Missouri	)	
Respondent.	)	

**APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI**

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this rate complaint case initiated by the Missouri Industrial Energy Consumers (“MIEC”) regarding certain rates charged by Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”).

In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit organization that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Hundreds of Consumers Council’s members are captive residential customers of Ameren Missouri’s electric utility monopoly services.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. Consumers Council has been an active party to several previous Commission cases, including many previous Ameren Missouri rate cases.

Consumers Council's interest in this matter relates to the proposed rates, terms and conditions of service for Ameren Missouri's residential electric customers. This interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for Ameren Missouri's residential electric customers. Consumers Council reserves the right to provide the Commission with more detailed positions on the Ameren Missouri proposals and testimony submitted in this case.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Attorney for the Consumers Council of Missouri  
Dated: February 8, 2016

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list of this case at the Missouri Public Service Commission, including the following, on this 8<sup>th</sup> day of February, 2016:

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