BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Propriety of the) Rate Schedules for Electric Service of) Union Electric Company, Doing Business as) Ameren Missouri

Case No. ER-2018-0226

APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now the Missouri Industrial Energy Consumers ("MIEC") and, pursuant to 4 C.S.R. 240-2.075 and this Commission's February 21 Order Opening Rate Case, Directing Notice, Establishing Time to Intervene and Requiring Company to Show Cause Why Its Rates Should Not Be Adjusted, files its application to intervene. For 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 ("Ameren").

2. As a representative of large industrial customers of Ameren, 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 does not yet have a position on the issues 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.

5. No party will be prejudiced by MIEC's intervention.

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

Respectfully submitted,

BRYAN CAVE, LLP

By: <u>/s/ Diana Vuylsteke</u>

Diana M. Vuylsteke, # 42419 211 N. Broadway, Suite 3600 St. Louis, Missouri 63102 Telephone: (314) 259-2543 Facsimile: (314) 259-2020 E-mail: dmvuylsteke@bryancave.com

Lewis R. Mills, #35275 Edward F. Downey, # 28866 221 Bolivar Street, Suite 101 Jefferson City, MO 65101 Telephone: (573) 556-6620 Facsimile: (573) 556-6630 E-mail: efdowney@bryancave.com lewis.mills@bryancave.com

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 5th day of March, 2018, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke