

**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)	Case No. ER-2010-0036
Increasing Rates for Electric Service Provided to)	
Customers in the Company's Missouri Service Area.)	

APPLICATION TO INTERVENE BY MISSOURI-ACORN

COMES NOW the Missouri Association of Community Organizations for Reform Now ("MO-ACORN"), by and through counsel, pursuant to Public Service Commission ("Commission") Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate case initiated by Union Electric Company d/b/a AmerenUE ("AmerenUE") when it filed new proposed tariff sheets on July 24, 2009, requesting an additional rate increase of approximately \$401 million annually as well as a 1.67% interim rate increase.

In support of this application, MO-ACORN states as follows:

1. MO-ACORN is a non-governmental, nonpartisan, nonprofit membership organization of low- and moderate-income families working together for social justice and stronger communities.
2. More than 30,000 MO-ACORN members receive electrical service from AmerenUE.
3. MO-ACORN's main office is located within AmerenUE's Missouri electric service territory at 4304 Manchester Road, St. Louis, Missouri 63110.
4. Correspondence, communications, orders and the decision in this matter should be addressed to:

Thomas G. Glick
Danna McKittrick, P.C.
7701 Forsyth Blvd., Suite 800
St. Louis, MO 63105
tglick@dmfirm.com

5. On July 27, 2009, this Commission issued an Order directing interested parties wishing to intervene to do so by August 17, 2009. Thus, this application is timely.
6. MO-ACORN's membership of low- and moderate-income families represents a separate demographic from the general public interest and creates a unique perspective and interest in the proposed rates, terms and conditions of service for AmerenUE's impact on low- and moderate-income families and their communities.
7. MO-ACORN is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for AmerenUE's residential electric customers.
8. MO-ACORN is opposed to AmerenUE's request for an interim rate increase in this case.
9. After further investigation, MO-ACORN will provide the Commission with a more detailed position on AmerenUE proposals and testimony submitted in this case.
10. MO-ACORN 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, the MO-ACORN respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

DANNA MCKITRICK, P.C.

BY: /s/ Thomas G. Glick
Thomas G. Glick, #44769
7701 Forsyth Blvd., Suite 800
St. Louis, MO 63105-3907
(314) 726-1000/(314) 725-6592 fax
E-mail: tglick@dmfirm.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was mailed, U. S. Mail, first class postage prepaid, this 14th day of August, 2009, to:

General Counsel's Office
Missouri Public Service Commission
P O Box 360
Jefferson City MO 65102

Office of the Public Counsel
P O Box 2230
Jefferson City MO 65102-2230

James B. Lowery
Smith lewis, LLP
111 S. Ninth Street, Suite 200
P O Box 918
Columbia, MO 65205

Steven R. Sullivan
General Counsel
Ameren Services Company
P O Box 66149 (MC 1300)
St. Louis, MO 63166-6149

Thomas M. Byrne
Managing Associate General Counsel
Ameren Services Company
P O Box 66149 (MC 1300)
St. Louis, MO 63166-6149

/s/ Thomas G. Glick