

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

In the Matter of the Propriety of the)
Rate Schedules for Electric Service of) File No. ER-2018-0226
Union Electric Company, Doing)
Business as Ameren Missouri.)

In the Matter of the Propriety of the)
Rate Schedules for Gas Service of) File No. GR-2018-0227
Union Electric Company, Doing)
Business as Ameren Missouri.)

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 to the above rate cases, opened by the Missouri Public Service Commission (“Commission”) itself, and involving its attempt to resolve issues related to Union Electric Company d/b/a Ameren Missouri (“Ameren” or “Company”) and the Tax Cuts and Jobs Act of 2017 (the “TCJA”).

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

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri and has participated in numerous cases

at the Missouri Public Service Commission (“Commission”), including several previous Ameren Missouri rate cases.

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

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3. Consumers Council’s interest in this matter relates to the rates, terms and conditions of service for the Company’s residential electric and natural gas customers. This interest is different than the general public interest. No other intervenor exclusively represents the residential customer class. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for Company’s residential electric customers. Consumers Council also plans to focus its representation on the interests of low income and low usage residential customers.

4. The short intervention deadline issued for this case did not allow enough time for Consumers Council to complete its internal review and to make a decision to seek intervention in this matter, and thus Consumers Council seeks the ability to file this request late. Consumers Council agrees to accept the procedural stance of this case, and believes that no party would be prejudiced by its late intervention.

5. Consumers Council's interest in intervening in this case has been further piqued by the legal arguments put forth in "Ameren Missouri's Response to Commission's Show Cause Order", filed on March 19, 2018. Consumers Council wishes to participate in the legal arguments surrounding the interpretation of the seminal Missouri court case, UCCM.¹

In its pleading, Company also states, "willing to commit the resources necessary to collaborate with the Commission Staff, the Office of the Public Counsel ("OPC"), and other intervenors in these proceedings."² Consumers Council further seeks intervention in this important rate case, in hopes that it may take part in such discussions and collaborations.

6. Furthermore, Consumers Council is concerned that Company has chosen to file its estimate of the impact of the TCJA under seal.³ Consumers Council believes that the impact of the new tax law should be not be kept secret, but rather should be made as public as possible. In the meantime, Consumers Council is seeking intervention in this rate case, so that it may review this "confidential information" for itself.

7. 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.

¹ State ex rel. Utility Consumers' Council of Missouri, Inc. v. Public Service Commission, 585 S.W.2d 41, 48 (Mo. banc 1979) ("UCCM").

² Ibid., p. 13.

³ Ameren Missouri Response, March 19, 2018, Exhibit 1.

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

Respectfully submitted,

Dated: March 21, 2018

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 13th day of July, 2016.

/s/ John B. Coffman
