BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility

Case No. EA-2019-0021

MISSOURI INDUSTRIAL ENERGY CONSUMERS' <u>STATEMENT OF POSITIONS</u>

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COMES NOW the Missouri Industrial Energy Consumers ("MIEC"), by and through the undersigned counsel, and for its Statement of Positions states as follows:

ISSUES

1. Should the Commission grant the certificate of convenience and necessity ("CCN") and

merger approval sought by the Company's application in this docket or reject it?

The Commission should approve the Company's application subject to the conditions specified in the February 11, 2019 Stipulation and Agreement.

2. If the Commission approves the CCN and merger approval sought by the Company's

application in this case, what conditions, if any, should the Commission impose?

The Commission should approve the Company's application subject to the conditions specified in the February 11, 2019 Stipulation and Agreement.

WHEREFORE, the Missouri Industrial Energy Consumers respectfully submits this

Statement of Positions.

Respectfully submitted,

BRYAN CAVE, LLP

By: <u>/s/ Lewis Mills</u>

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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 13th day of February, to all parties on the Commission's service list in this case.

/s/ Lewis Mills_____