

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

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

**APPLICATION TO INTERVENE
OF UNITED FOR MISSOURI, INC.**

COMES NOW United for Missouri, Inc. (“UFM”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting UFM’s *Application to Intervene*. For its *Application*, UFM states as follows:

1. On February 1, 2016, the Missouri Industrial Energy Consumers (MIEC) and 32 other individual customers of Ameren Missouri filed a complaint with the Missouri Public Service Commission (“Commission”) against Union Electric Company, d/b/a Ameren Missouri, asking that Ameren Missouri’s rate structure be redesigned to reduce rates for Noranda, Inc.
2. On February 2, 2016, the Commission issued its *Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene*, setting February 9 as the date for the filing of applications to intervene.
3. UFM is a nonprofit mutual benefit corporation organized under the laws of the state of Missouri. UFM has over 80,000 members and is committed to serving its members and the public in supporting free market economic policies and limited government in the state.

UFM believes that free markets and limited government are the surest route to economic prosperity.

4. UFM's interest is different than the interest of the general public. UFM's intervention and participation in this proceeding will also serve the public interest in that it will provide the Commission with UFM's perspective. UFM seeks to become a party to this case for all purposes.

5. UFM opposes the complaint. The complaint seeks to have the Commission apply different standards in its ratemaking treatment for Noranda, Inc., standards that are uniquely tailored to Noranda's economic circumstances. Such specialized treatment and the subsidies such rate treatment will create are unjust and unduly discriminatory.

WHEREFORE, for the foregoing reasons, United for Missouri, Inc. respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198
314 Romaine Spring View
Fenton, MO 63026
Telephone: 314-341-5769
Email: jdinton@reagan.com

Attorney for United for Missouri, Inc.

Filed: February 5, 2016

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EC-2016-0199 via electronic transmission this 5th day of February, 2016.

/s/ David C. Linton _____