

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

In the Matter of the Application of The Empire)
District Electric Company for Approval of Its) File No. EO-2018-0092
Customer Savings Plan.)

AMEREN MISSOURI'S APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") pursuant to 4 CSR 240-2.075, and for its Application for Intervention in this case, states as follows:

1. Ameren Missouri is a Missouri corporation, in good standing in all respects, with its principal office and place of business located at 1901 Chouteau Avenue, St. Louis, Missouri 63103. The Company is engaged in providing electric and gas utility services in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). There is already on file with the Commission a certified copy of the Company's Articles of Incorporation (See Commission Case. No. EA-87-105), a Certificate of Corporate Good Standing (See Case No. EA-2015-0273), and a copy of the Company's Fictitious Name Registration as filed with the Missouri Secretary of State's Office (See Case No. EN-2011-0069), and said documents are incorporated herein by reference and made a part hereof for all purposes.

2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to the undersigned counsel and to:

Thomas Byrne
Senior Director, Regulatory Affairs
Ameren Missouri
1901 Chouteau Avenue (MC 1450)
St. Louis, MO 63103
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3. Ameren Missouri's interest in this case arises from its status as a Commission-

regulated investor-owned electric utility with a specific interest in some of the important regulatory issues in this case, including the advance authorizations and findings The Empire District Electric Company's ("Empire") seeks regarding its proposed wind investment and the retirement of the coal-fired Asbury facility and the regulatory accounting treatment Empire seeks relating to that retirement. The Commission's consideration of such issues could, as a practical matter, have an impact upon similar issues as they arise in Ameren Missouri cases or other proceedings at the Commission, which in turn could have an impact on Ameren Missouri's business, making Ameren Missouri's interests different than the interests of the general public. Moreover, Ameren Missouri's intervention is in the public interest as it may aid the Commission in addressing the policy implications of such issues, including by allowing Ameren Missouri to present additional perspectives on such issues.¹

4. At this early juncture of the case, Ameren Missouri has not determined its position on the issues in this case.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

¹ See *Order Granting Applications to Intervene*, File No. WR-2017-0285 (Aug. 9, 2017) (Where the Commission concluded that allowing Ameren Missouri and KCP&L to intervene in Missouri American Water Company's rate case would serve the public interest for that very reason, also finding that as regulated utilities they had interests different than the interests of the general public).

Respectfully Submitted,

/s/ James B. Lowery

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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 22nd day of November, 2017.

/s/ James B. Lowery

James B. Lowery