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March 10, 2006

Ms. Cully Dale  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, Missouri 65101

Re: Case No. EO-2006-0240

Dear Ms. Dale:

Attached for filing in the above-referenced case are an original and eight (8) copies of the Application to Intervene Out of Time of the Missouri Industrial Energy Consumers.

Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

Diana M. Vuylsteke  
DMV:rms

cc: All Parties

FILED<sup>4</sup>

MAR 10 2006

Missouri Public  
Service Commission

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*And Bryan Cave,  
A Multinational Partnership,  
London*

**FILED<sup>4</sup>**

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**MAR 10 2006**

In Re: Union Electric Company's 2005  
Utility Resource Filing Pursuant to  
4 CSR 240 – Chapter 22

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**Missouri Public  
Service Commission**  
Case No. EO-2006-0240

**APPLICATION TO INTERVENE OUT OF TIME OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Anheuser-Busch, Boeing, DaimlerChrysler, Ford, General Motors, Hussmann Refrigeration, J.W. Aluminum, Monsanto, Pfizer, Precoat, Procter & Gamble, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers or "MIEC" and, pursuant to 4 C.S.R. 240-2.075, files its Application to Intervene Out of Time. For its Application, the Missouri Industrial Energy Consumers states as follows:

1. The Missouri Industrial Energy Consumers is a Missouri corporation and is a group of large industrial energy consumers of Union Electric Company d/b/a AmerenUE ("AmerenUE").
2. As large industrial customers of AmerenUE, the MIEC's interest in this case is different than that of the general public.
3. The MIEC is unsure of the position that it will take in this case, but reserves the right to take positions on the issues as this case proceeds.
4. The MIEC's intervention will serve the public interest by assisting the record for the Commission's decision in this case.
5. Good cause exists to grant the MIEC's intervention out of time in this case. The MIEC did not intervene by the December 28, 2005 deadline in the Commission's December 7, 2005 Order in this case because it was unaware of the Commission's Order.
6. The MIEC has participated in several meetings of the parties to this case and will accept the record as it stands. Its intervention will not prejudice any party or disrupt this proceeding, which is still at an early stage.

WHEREFORE, the MIEC respectfully requests that it be permitted to intervene, and that it be made a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: *Diana Vuylsteke*

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Attorney 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 hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 10<sup>th</sup> day of March, 2006, to all parties on the Commission's service list in this case.

*Diana Vuytsteke*