

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

In the Matter of an Investigation of Union)	
Electric Company d/b/a AmerenUE.)	Case No. EO-2006-0430

APPLICATION TO INTERVENE BY AARP

COMES NOW AARP, by and through counsel, pursuant to 4 CSR 240-2.075, and respectfully applies for intervention as a party in this formal investigation initiated by the Missouri Public Service Commission (Commission) on May 11, 2006 into the reasonableness of the electric rates of Union Electric Company d/b/a AmerenUE (AmerenUE), including issues regarding the Joint Dispatch Agreement, EEI, Inc., and sulfur dioxide emissions allowances.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a

whole.¹ AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues.

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

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2. The Commission's May 11, 2006 Order Directing Staff to Investigate Union Electric Company d/b/a AmerenUE, directed interested parties wishing to intervene to do so by May 21, 2006, and thus, this application is timely.

¹ In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

3. AARP has a long track record of professional participation before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP has provided credible and persuasive testimony, assisting commissioners in crafting just and reasonable decisions on many issues regarding rates and services for older utility consumers.

4. AARP's interest in this matter relates to the rates, terms and conditions of service for AmerenUE's residential electric customers. More specifically, AARP's interest in this matter relates to how potential overearnings and class cost assignments that may be directly and adversely impacting those Missouri seniors who are currently receiving electric service from AmerenUE. This interest is different than the general public interest. Seniors are particularly vulnerable to increases in energy prices. Seniors also generally devote a higher percentage of their total spending than do other age groups on residential energy costs. Seniors also have special needs with regard to access to electric service.

5. AARP is interested in gaining access to much of the information regarding AmerenUE's cost of service and rate design which has thus far only been available to the Commission's Staff and the Office of the Public Counsel (Public Counsel). AARP is willing to comply with the protective order issued by the Commission in this case. Accordingly, AARP believes that its intervention and participation in this investigation proceeding would serve the public interest.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 19th day of May 2006:

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