

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

In the Matter of the Application of Union	)	
Electric Company for Authority to Continue the	)	
Transfer of Functional Control of Its Transmission	)	Case No. EO-2011-0128
System to the Midwest Independent Transmission	)	
System Operator, Inc.	)	

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

Comes now Anheuser-Busch Companies, Inc., BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Monsanto, Precoat Metals, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Saint Gobain, Solutia and U.S. Silica Company (referred to herein as the Missouri Industrial Energy Consumers or “MIEC”) and, pursuant to 4 C.S.R. 240-2.075 and the Commission’s November 2, 2010 *Order Providing Notice and Establishing Intervention Deadline* in this case, file their application to intervene. For their application, the MIEC and its individual members state as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Union Electric Company d/b/a Ameren Missouri.
2. As large industrial customers of AmerenUE, the interests of the MIEC and each of its members are different than that of the general public and may be adversely affected by a final order arising from this case.
3. The MIEC and its members are reviewing Ameren Missouri’s filing in this case and reserve the right to take positions on specific issues as this case proceeds.
4. Intervention by the MIEC and its members will serve the public interest by assisting the Commission’s record for decision in this case.

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

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke

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Energy Consumers

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 24<sup>th</sup> day of November, 2010, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke