

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

In the Matter of Ameren Missouri's)	
2017 Integrated Resource Plan)	EO-2019-0314
Annual Updated Report.)	

**APPLICATION OF THE EASTERN MISSOURI LABORERS DISTRICT COUNCIL
TO INTERVENE OUT OF TIME**

COMES NOW the Eastern Missouri Laborers District Council ("EMLDC") and its affiliated local unions in Missouri, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in above-captioned case, which was initiated on April 12, 2019 by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") when it filed its 2019 Integrated Resource Plan Annual Update Report ("Annual Update").

In support of this application, EMLDC states as follows:

1. The EMLDC is headquartered at 3450 Hollenberg Dr., Bridgeton, MO 63044, and is an affiliate council of the Laborers International Union of North America ("LiUNA"), one of strongest unions in the country. Laborers are construction workers, government workers, health care providers, industrial employees, service workers, and educators. Members of EMLDC reside and work throughout Missouri, including within the Ameren Missouri service territory and regions impacted by resource planning that is the subject of this case. The interests of EMLDC and its union members in this matter are unique and different than the general public interest.
2. The Annual Update contains information regarding Ameren Missouri's intentions regarding projects for which EMLDC workers are involved or may be involved

in the future. EMLDC has a significant interest in gaining further understanding of the electric utility's plans as stated in its IRP documents, and in providing the Commission with its perspective on these plans through comments that would be filed in this docket. Pending further investigation and review of this matter, EMLDC reserves the right to state its interests in more detail and to explain how those interests serve the greater public interest through its written comments in this case.

3. On April 16, 2019, the Commission issued its "Order Directing Notice, Adding Parties, and Setting Deadline for Intervention Requests" setting a short intervention deadline of April 22, 2019 (less than one week after the update was filed). EMLDC did not become aware of the Annual Update until after the intervention deadline had passed. After becoming aware, EMLDC moved expeditiously to review the Annual update and related documents, to ascertain how the projects contained in the Annual Update could potentially involve EMLDC workers, and to seek legal representation in order to properly pursue intervention in this IRP case. EMLDC has filed this request for intervention as soon as it was able to receive authorization to do so, and thus believes that good cause exists to allow intervention at this time. EMLDC agrees to accept the current procedural stance of this case, and further asserts that its late intervention will in no way delay this case nor impact the rights of Ameren Missouri or any other party.

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

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5. EMLDC believes that its intervention and participation in this proceeding would serve the public interest, and it wishes to become a party to this case for all purposes.

WHEREFORE, EMLDC respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

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Dated: May 21, 2019

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list of this case at the Missouri Public Service Commission, including the following, on this 21st day of May 2019:

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