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

In the Matter of the Application of Union Electric	)	
Company d/b/a Ameren Missouri for Authority to	)	Case No. EO-2012-0146
Sell and Repurchase Coal and Lease Property	)	

## APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch Companies, Inc., BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Metal Container Corporation, Monsanto, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Enbridge Ozark Pipeline Company, Saint Gobain, and Solutia (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 10, 2011 *Order Directing Notice, Setting Intervention Deadline, Directing Staff Recommendation and Setting and On-the-Record Proceeding* in this case, file their application to intervene. For their application, the MIEC states 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 ("Ameren Missouri").
- 2. As large industrial customers of Ameren Missouri, the interests of the MIEC is different than that of the general public and may be adversely affected by a final order arising from this case.
- 3. The MIEC does not yet have a position regarding the relief sought by Ameren Missouri in this case, and reserves the right to take positions on specific issues as this case proceeds.

4. Intervention by the MIEC 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

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## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 11<sup>th</sup> day of November, 2011, to all parties on the Commission's service list in this case.

/s/ Diana	Vuylsteke	