

**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 Permission and)	
Approval and a Certificate of Public Convenience and)	
Necessity Authorizing it to Construct, Install, Own,)	File No. EA-2015-0273
Operate, Maintain and Otherwise Control and Manage)	
Solar Generation Facilities in Montgomery County,)	
Missouri.)	

**APPLICATION TO INTERVENE
OF UNITED FOR MISSOURI**

COMES NOW United For Missouri, Inc. (“UFM”), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies to intervene as a party in the above referenced case. In support of this Application, UFM states as follows:

1. UFM is a nonprofit mutual benefit corporation organized under the laws of the state of Missouri. Formed in July 2010, UFM has over 77,000 members and is committed to serving its members and the public in educating the public about and supporting economic policies in the state that will achieve growth, opportunity and prosperity. UFM seeks to help state legislators, state-wide elected officials, state agencies, the media and individual citizens understand why the American free enterprise system is the best method of ensuring prosperity for all Missourians.

2. On June 29, 2015, Ameren Missouri filed its Application for a Certificate of Convenience and Necessity with the Missouri Public Service Commission (“Commission”) in the above referenced file, seeking authority to build solar generation facilities in Montgomery County, Missouri.

3. On June 30, 2015, the Commission issued its *Order and Notice*. It established a deadline to file applications to intervene of July 28, 2015.

4. UFM's interest is different than the interest of the general public. UFM's intervention and participation in this proceeding would serve the public interest in that it will provide the Commission with UFM's perspective. UFM seeks to become a party to this case for all purposes.

5. In general, UFM opposes statutory mandates on the economy. Such mandates distort the efficiency of the free market. Statutory mandates inherently indicate that the mandated investment would not be made but for the mandate. In the utility industry, such mandates harm ratepayers by artificially increasing costs and, therefore, rates. However, recognizing the existing legal mandates of the Missouri Renewable Energy Standard, UFM will not oppose the application at this time, but reserves the right to modify its position based upon evidence adduced in these proceedings.

WHEREFORE, for the foregoing reasons, United for Missouri respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: /s/ David C. Linton

David C. Linton, #32198
314 Romaine Spring View
Fenton, MO 63026
Telephone: 314-341-5769
Email: jdlington@reagan.com

Filed: July 27, 2015

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EA-2015-0145 via electronic transmission this 27th day of July, 2015.

/s/ David C. Linton