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

In Re Union Electric Company's 2008 Utility	)	
Resource Filing pursuant to 4 CSR 240 -	)	Case No. EE-2010-0243
Chapter 22.	)	

## APPLICATION TO INTERVENE OF THE MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Buzzi Unicem USA, Inc., and SSM HealthCare, (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

- 1. Applicants own and operate not-for profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of electricity from Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") as well as utilities from other utility companies in the state of Missouri.
- 2. The matters to be considered in this case and the Public Service Commission's ("Commission") determinations thereon, could have a direct and significant impact on Applicants' cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record.
- 3. As large user customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While

Applicants do not at this time have sufficient information to assert a position in this case, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, and any documents of other parties filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Lisa C. Langeneckert. Sandberg Phoenix & von Gontard P.C. 515 North Sixth Street, Suite 1500 St. Louis, MO 63101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention.

SANDBERG PHOENIX & von GONTARD P.C.

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By:

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## **CERTIFICATE OF SERVICE**

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. EE-2010-0243.

Dated at St. Louis, Missouri this 19th day of March, 2010

Lisa C. Langeneckert