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

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Missouri Public Service Commission

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers In the Company's Missouri Service Area.

Case No. ER-2007-0002

#### VERIFIED APPLICATION TO INTERVENE OUT OF TIME OF THE MISSOURI ASSOCIATION FOR SOCIAL WELFARE

COMES NOW the Missouri Association for Social Welfare (hereinafter "MASW"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies to this Commission for permission to intervene as a party in this general rate case initiated by Union Electric Company d/b/a AmerenUE ("AmerenUE"). In support of this application, MASW states as follows:

1. MASW is a citizen membership organization founded in 1901. It is the mission of MASW to provide the leadership, research, education and advocacy to improve public policies and programs impacting the health and welfare of all people in Missouri. Numerous members of MASW, and citizens on whose behalf it advocates, live in AmerenUE's Missouri electric service territory and are customers of AmerenUE electric service.

2. MASW is a not-for-profit Missouri corporation. A Certificate of Good Standing is attached hereto and incorporated herein by this reference.

3. MASW is located at The Center for Social Justice, 606 East Capitol Avenue, Jefferson City, Missouri 65101. Correspondence, communications, orders and the decision in this matter should be addressed to:

> Gaylin Rich Carver MO Bar No. 51131 3225-A Emerald Lane P.O. Box 6670 Jefferson City, MO 65102-6670

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Ph: (573) 636-2614 Fax: (573) 636-6541 E-mail: carver@gptlaw.net

and

Bob Quinn Executive Director, MASW The Center for Social Justice 606 East Capitol Avenue Jefferson City, MO 65101 Ph: (573) 634-2901 Fax: (573) 635-1648 E-mail: CitizenVoice@masw.org

4. MASW does not have any pending actions or final unsatisfied judgments or decisions against it, as contemplated by 4 CSR 240-2.060(1)(K).

5. MASW does not have any annual reports or assessment fees that are overdue.

6. MASW has historically advocated for citizens in financial hardship, and these citizens would be disproportionately impacted by an increase in the rates for electric service. The interests of these citizens in this case are different than those of other interveners and those of the general public, and these citizens may be adversely affected by a final order arising from this case.

7. MASW's intervention will serve the public interest.

8. MASW opposes the relief sought by AmerenUE in this case. MASW is continuing to review AmerenUE's filing and reserves the right to take positions on specific issues as this case proceeds.

9. This Application is filed more than 30 days after the Comission issued its Order giving notice of this case. At the time the Order was given, MASW was without an Executive Director. Since the Order was given, Mr. Quinn has been named as the Executive Director, and he is scheduled to fully assume the position on August 21, 2006. MASW is a social welfare

organization with few paid, full-time staff. The lack of an Executive Director substantially impaired the ability of MASW to file its Application within the appropriate time limit, and MASW respectfully requests that the Commission grant MASW leave to file its Application out of time.

WHEREFORE, MASW respectfully requests that the Commission grant its Application to Intervene Out of Time, and that it be made a party to this case.

Respectfully submitted.

Gaylin Rich Garver MO Bar No. 51131 3225-A Emerald Lane P.O. Box 6670 Jefferson City, MO 65102-6670 Ph: (573) 636-2614 Fax: (573) 636-6541 E-mail: carver@gptlaw.net

#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed to the following this \_\_\_\_\_ day of August 2006:

General Counsel's Office Missouri Public Service Commission P O Box 360 Jefferson City MO 65102

James B. Lowery Smith Lewis, LLP 111 S. Ninth St., Suite 200 P.O. Box 918 Columbia, MO 65201 Office of the Public Counsel P.O. Box 2230 Jefferson City, MO 65102

Steven R. Sullivan General Counsel Ameren Services Company P.O. Box 66149 St. Louis. MO 63166-6149

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Gaylin Rich Carver MO Bar No. 51131 3225-A Emerald Lane P.O. Box 6670 Jefferson City, MO 65102-6670 Ph: (573) 636-2614 Fax: (573) 636-6541 E-mail: carver@gptlaw.net

#### VERIFICATION

COMES NOW Bob Quinn, and on his oath. states that he is the Executive Director of the Missouri Association for Social Welfare, that he is familiar with the matters set forth in this Application, and that the matters alleged are true and correct to the best of his knowledge, information, and belief. Mr. Quinn further states that he has been authorized to sign and file this Application on behalf of Missouri Association for Social Welfare.

BOB QUINN

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Subscribed and sworn to me this  $21^{1/2}$  day of August, 2006.

My commission expires: 1. 19-10-1

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KIMBERLY R. WILLIAMS Cole County My Commission Expires July 19, 2007

# STATE OF MISSOURI

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## CORPORATION DIVISION **CERTIFICATE OF GOOD STANDING**

I, ROBIN CARNAHAN, Secretary of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

#### MISSOURI ASSOCIATION FOR SOCIAL WELFARE B00009613

was created under the laws of this State on the 16th day of September, 1942, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 3rd day of August. 2006

Certification Number: 8934764-1 Reference:

Secretary of State

\_Verify this certificate online at http://www.sos.mo.gov/businessenfity/verifi http://www.sos.mo.gov/businessenfity/verifity/verifi http://www.sos.mo.gov/

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