

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2023 Utility Resource) File No. EO-2024-0020
Filing pursuant to 20 CSR 4240 – Chapter 22)

APPLICATION TO INTERVENE
OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION d/b/a
MISSOURI ELECTRIC COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”), by and through counsel, pursuant to Commission Rule 4 CSR 4240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MEC states as follows:

1. On July 28, 2023, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a Notice with the Commission providing it would make its triennial Integrated Resource Plan (“IRP”) filing as required by the Commission’s Electric Utility Resource Planning (4 CSR 4240-22) reporting requirements. Ameren Missouri subsequently filed its IRP on September 26, 2023, and the Commission issued an order on September 27, 2023 requiring entities that wished to intervene to file their applications by October 30, 2023. MEC wishes to intervene.

2. MEC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 *et seq.* RSMo., with authority to exercise public powers of a political subdivision of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MEC. Seventy-two (72) municipalities are current parties to the joint contract establishing the MEC.

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

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4. MEC currently serves ten (10) municipalities directly embedded in Ameren Missouri's transmission system that take transmission service through the Midcontinent Independent System Operator ("MISO"), and MEC itself is a transmission customer of Ameren Missouri.

5. MEC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well as municipal electric systems directly imbedded in Ameren Missouri's transmission system that take transmission through MISO. MEC and its members have direct and immediate interests in this proceeding that are not currently represented in this matter.

6. Granting intervention to MEC would serve the public interest by allowing MEC's experience and insight to be a part of the IRP process.

7. MEC does not have a position at this time in this case to the proposed IRP but reserves the right to take positions on specific issues as this case proceeds.

8. No party will be prejudiced by MEC's intervention.

WHEREFORE, MEC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

HEALY LAW OFFICES, LLC

/s/ Terry M. Jarrett

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Dated: October 17, 2023

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 for this case on this 17th day of October, 2023.

/s/ Terry M. Jarrett
Terry M. Jarrett