

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

| | | |
|---|---|-----------------------|
| In the Matter of the Petition of Union Electric |) | |
| Company d/b/a Ameren Missouri for a |) | |
| Financing Order Authorizing the Issue of |) | File No. EF-2024-0021 |
| Securitized Utility Tariff Bonds for Energy |) | |
| Transition Costs related to Rush Island |) | |
| Energy Center |) | |

**APPLICATION TO INTERVENE OF
MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumer’s Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity, water, and natural gas throughout the State of Missouri including in the areas served by Ameren Missouri.
2. On Nov. 21, 2023, Ameren Missouri filed this petition seeking authority to issue securitized utility tariff bonds for energy transition costs related to the early retirement of its Rush Island Energy Center. The Commission issued notice and directed that interested parties apply to intervene no later than Dec. 15, 2023. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of service of the large commercial and industrial customers.
3. As a representative of large user customers of Ameren Missouri, the MECG has a direct and immediate interest in these proceedings that is different from that of the general public. While MECG does not at this time have sufficient information to assert a position in this case, it reserves the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein.

4. Pleadings, notices and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

/s/ Tim Opitz

Tim Opitz, Mo. Bar No. 65082
Opitz Law Firm, LLC
308 E. High Street, Suite B101
Jefferson City, MO 65101
T: (573) 825-1796
tim.opitz@opitzlawfirm.com

ATTORNEY FOR MIDWEST
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 14th day of December 2023:

/s/ Tim Opitz
