

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

In the Matter of the Application of Union)
Electric Company dba Ameren Missouri)
for Permission and Approval and a) Case No. **EA-2024-0212**
Certificate of Convenience and)
Necessity under 20 CSR 4240-3.105)

APPLICATION TO INTERVENE
OF THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075 and the Commission’s May 29, 2024 Order, and respectfully applies for intervention as a party in this case, initiated by Union Electric Company d/b/a Ameren Missouri (“Company”).

In support of this application, Consumers Council states as follows:

1. Consumers Council is a nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission, including many cases involving Ameren Missouri.

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

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3. Consumers Council's interest in this matter relates to the charges, terms and conditions of service for residential electric customers relating to the Company's proposal in this case for a "third program resource for its Community Solar Program", including the access for and impact upon Company's low-income and vulnerable residential customers. This interest is different than the general public interest.

4. Consumers Council's position in this matter is that access to meaningful community solar programs should be broadly available to all residential customers on reasonable and equitable terms.

Most of the program details that are being proposed by Company in this matter have been designated as "highly confidential" due to purported "marketing" information (Schedules B, C-2, D, F and G to Company's Application, as well as the cost of the project, which is redacted on p. 7 of the Application). Once Consumers Council has been granted intervention status in this case, has been allowed to review the information that is currently shielded, and has had an opportunity to conduct discovery, then more specific positions on Company's proposal can be developed and shared with the Commission through the official record of this matter.

WHEREFORE, Consumers Council respectfully requests formal intervention in this matter for all purposes.

Respectfully submitted,

Dated: June 7, 2024

/s/ John B. Coffman

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Attorney for Consumers Council

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 7th day of June, 2024.

/s/ John B. Coffman
