BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Permission and)	
Approval and Certificates of Public Convenience and)	File No. EA-2024-0237
Necessity Authorizing it to Construct a Simple Cycle)	
Natural Gas Generation Facility	j	

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 Consumers Group ("MECG") is an incorporated entity representing the interests of large commercial and industrial users of electricity throughout the State of Missouri including in the areas served by Ameren Missouri.
- 2. On June 7, 2024, Ameren Missouri filed its Application requesting a Certificate of Convenience and Necessity ("CCN") to construct, install, own, operate, maintain, and otherwise control and manage a new simple cycle natural gas generating facility. In addition, Ameren Missouri seeks certain special accounting treatment related to the proposed project. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on the reliability and cost of electric service of the large commercial and industrial customers represented by MECG.
- 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 on all issues that may arise in this case, including whether or not the project satisfies the Commission's "tartan" factors, 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. At this time, MECG states that it opposes the special accounting treatment sought by the company. MECG anticipates being able to assert positions on other issues identified throughout this case in its position statements that may be required in a procedural schedule.

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

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ATTORNEY FOR MIDWEST ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 25th day of June 2024:

/s/ Tim Opitz