

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Adjust its)
Revenues for Electric Service.) **File No. ER-2024-0319**

APPLICATION TO INTERVENE BY 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 respectfully applies for intervention as a party in this electric rate case, initiated by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "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 the previous Ameren Missouri electric rate case.

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 rates, terms and conditions of service for the Company's residential electric customers, including low-income and vulnerable customers. This interest is different than the general public interest.

4. Consumers Council wishes to explore the utility's proposals further, because the monopoly utility rates imposed in this case could seriously impact public health and safety. Consumers Council is opposed to any unjust and unreasonable revenue requirement, as well as is opposed to any discriminatory rate design for the utility's residential electric customers. The issues in this case have drawn our attention, and the organization desires the opportunity to conduct discovery in this matter. Consumers Council reserves the right to provide the Commission with more detailed positions in this rate case, following discovery and further review.

With regard to rate design, Consumers Council is generally opposed to mandatory time-of-use rate plans; we prefer that such rate plans be "opt-in". Consumers Council also favors a residential rate design that keeps fixed monthly charges low, by applying the majority of any necessary rate increase to the usage components of residential bills, which helps give customers more control over their electric bills.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and it wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant this Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

Dated: July 16, 2024

/s/ John B. Coffman

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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 16th day of July 2024.

/s/ John B. Coffman
