

**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	)	Case No. EU-2012-0027
for the Issuance of an Accounting Authority Order	)	
Relating to its Electrical Operations	)	

**APPLICATION TO INTERVENE OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Anheuser-Busch Companies, Inc., BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge, Explorer Pipeline, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Metal Container Corporation, Monsanto, Procter & Gamble Company, Nestlé Purina PetCare, Noranda Aluminum, Ozark Pipeline Company, Saint Gobain, and Solutia (referred to herein as the Missouri Industrial Energy Consumers or “MIEC”) and, pursuant to 4 C.S.R. 240-2.075 and the Commission’s July 26, 2011 *Order Directing Notice and Filings* in this case, file their application to intervene. For their application, the MIEC and its individual members state as follows:

1. The MIEC is a Missouri corporation, and the members of the MIEC are large industrial customers of Union Electric Company d/b/a AmerenUE (“AmerenUE”).
2. As large industrial customers of AmerenUE, the interests of the MIEC and each of its members are different than that of the general public and may be adversely affected by a final order arising from this case.
3. The MIEC and its members oppose the relief sought by AmerenUE in this case, and reserve the right to take positions on specific issues as this case proceeds.

4. Intervention by the MIEC and its members will serve the public interest by assisting the Commission's record for decision in this case.

WHEREFORE, the MIEC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Diana Vuylsteke

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Energy Consumers

#### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 1<sup>st</sup> day of August, 2011, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke