

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

**In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariff to Adjust)
its Revenues for Electric Service)**

Case No. ER-2026-0291
Tracking No. JE-2026-0161

VERIFIED APPLICATION OF IBEW 1439 TO INTERVENE

COMES NOW, International Brotherhood of Electrical Workers Local Union No. 1439, AFL-CIO ("Local 1439"), by and through its counsel, and respectfully submits this Application to Intervene in the above-referenced matter pursuant to Missouri Public Service Commission ("Commission") Rule 20 CSR 4240-2.075. In support thereof, Local 1439 states as follows:

1. Local 1439 is a labor organization as defined in the National Labor Relations Act, as amended, 29 U.S.C. § 152, *et. seq.* that is doing business and representing employees in the State of Missouri. Local 1439 has a collective bargaining agreement with Union Electric Company d/b/a Ameren Missouri ("Ameren") and represents certain employees employed by Ameren.

2. The name, address, telephone number, and e-mail address of the party seeking to intervene is:

IBEW Local Union No. 1439
2121 59th St.
St. Louis, MO 63110
(314) 644-6111
Jeremy Pour, Business Manager
jeremyp@ibew1439.com

Counsel: Janine M. Martin
HAMMOND & SHINNERS, P.C.
13205 Manchester Rd., Suite 210
St. Louis, MO 63131
(314) 727-1015
jmartin@hammondshinners.com

Local 1439 requests that service be made to its counsel of record.

3. Local 1439 is an unincorporated association but does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(2)(D) are directed. It does not appear to be the intent of those regulatory subsections for the Union to file a list of all of its members, and the Union hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that the Union must comply with the subsection, the required list will be tendered immediately.

4. Local 1439 does not have any pending actions or final unsatisfied judgments or decisions against it.

5. The Union does not have any annual reports or assessment fees that are overdue.

6. On June 26, 2026, Ameren filed tariff sheets designed to increase the electric rates to customers in its Missouri service area.

7. On June 30, 2026, the Commission issued its *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule*, which set an intervention deadline of July 15, 2026. Local 1439's Application to Intervene is therefore timely.

8. Local 1439 represents approximately 850 members employed in the electric and natural gas utility industry. Approximately 700 of those members are employed by Ameren in the areas of electric distribution and other support areas, working under a collective bargaining agreement, and who may be affected by Orders entered by the Commission in this proceeding. Local 1439 and its members have a substantial and unique interest in this proceeding because the Commission's ruling on this proceeding will have a direct effect on its members' wages, benefits, staffing levels, working conditions and job security.

9. The Applicant's filing seeks to recover increased costs for Operations and Maintenance activities and infrastructure improvements. Local 1439 members have extensive knowledge of Ameren's operations and maintenance and construction activities and work on these tasks on a daily basis. The work of the membership relates directly to maintaining reliable service for customers of the Company. Applying the appropriate rate treatment for this work is important as it will directly impact items like Local 1439 staffing levels, equipment, and safety training.

10. The vast majority of these members are not only employees, but also customers of the utility and are directly impacted by any electric utility rate increases.

11. Accordingly, Local 1439 and the employees it represents are interested parties in this proceeding, and Local 1439 and the employees it represents have a direct interest in this proceeding which is different from that of the general public. As the exclusive bargaining representative for certain employees employed by Ameren, Local 1439's interest cannot be legally or adequately represented by any other party.

12. Local 1439 takes no position at this time regarding the relief sought by Ameren in File No. ER-2026-0291. Local 1439 cannot assert a position at this time because, currently, Local 1439 is not certain how the relief sought by Ameren may impact, directly or indirectly, the wages, benefits, and terms and conditions of employment of the employees that Local 1439 represents. Local 1439 is reviewing the filed testimony and can assert a position after obtaining more information through the discovery and prehearing process, which it will participate in as necessary in order to develop its position on specific issues. To the extent that the adjudication of File No. ER-2026-0291 may impact, directly or indirectly, the wages, benefits, and terms and conditions of employment of the employees that Local 1439 represents, Local 1439 reserves the right to participate in this proceeding as necessary to protect the interests of the employees it represents.

13. Local 1439 seeks permission to intervene in this proceeding pursuant to Commission Rule 20 CSR 4240-2.075. It will work within all deadlines and will not impede the timely completion of the docket.

14. No party to this proceeding will be adversely impacted or prejudiced by granting this Application to Intervene.

WHEREFORE, having stated the grounds for intervention and its interest in this proceeding, the International Brotherhood of Electrical Workers Local Union No. 1439 hereby requests that the Commission:

- A. Grant it leave to intervene in this proceeding on its behalf and on behalf of the employees it represents and to be heard at such time as the Commission may fix; and
- B. In all respects make Local 1439 a party to this proceeding.

Respectfully submitted,

/s/ Janine M. Martin

JANINE M. MARTIN, MBN 46465
HAMMOND and SHINNERS, P.C.
13205 Manchester Rd., Suite 210
St. Louis, Missouri 63131
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
jmartin@hammondshinners.com

Attorneys for IBEW Local 1439

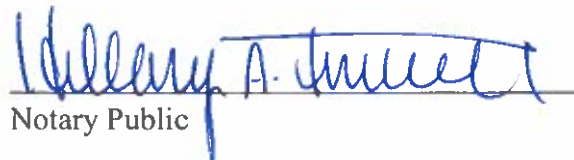
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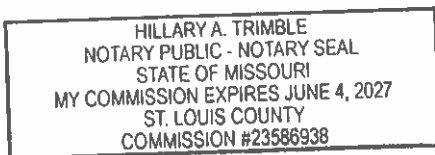
COMES NOW Janine Martin and, upon her oath, states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Martin further states that she has been authorized to sign and file this application on behalf of IBEW 1439.


JANINE M. MARTIN

Subscribed and sworn to before me this 14th day of July, 2026.

My Commission Expires:


Notary Public



CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on July __, 2026, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Janine M. Martin _____