

## ATTORNEY GENERAL OF MISSOURI

JEFFERSON CITY 65102

July 10, 2006

P.O.Box 899 (573) 751-3321

Ms. Colleen Dale Secretary and Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Re: Union Electric Company d/b/a AmerenUE Case Nos: ER-2007-0002 and GR-2007-0003

Dear Ms. Dale:

JAY NIXON

ATTORNEY GENERAL

Accompanying this letter for filing in the above referenced matters are the original and eight (8) copies of the State of Missouri's Application to Intervene in the pending electric rate case and natural gas rate case for Union Electric.

Thank you for your assistance with this filing. If you have any questions please do not hesitate to contact me.

Sincerely,

JEREMIAH W. (JAY) NIXON Attorney General

Douglas E. Micheel Assistant Attorney General JUL 1 0 2006

**FILED**<sup>4</sup>

Missouri Public Service Commission

## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION LED<sup>4</sup>

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JUL 1 0 2006

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service ) **Provided to Customers in the Company's Missouri Service Area.** 

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Missouri Public Service Commission Case No. ER-2007-0002

## State of Missouri's Application to Intervene

Comes Now the State of Missouri and pursuant to 4 CSR 240.2-070 files its

Application to Intervene in the above referenced matter. In support of its Application the

State shows the Commission as follows:

1. On July 7, 2006 Union Electric Company d/b/a AmerenUE (herein after "UE")

filed tariffs designed to increase its electric rates by approximately \$360.7 million.

2. The State of Missouri is one of UE's largest customers.

3. The State of Missouri's interests in this matter are different from that of the

general public and an increase in the rates for its electrical service will have a substantial effect on the State's budget.

4. The State of Missouri is opposed to the relief requested by UE.

5. The State of Missouri has intervened in UE's rate or complaint cases in the past to protect its unique interests as a customer of UE.

6. Granting the State's requested intervention would serve the public interest.

WHEREFORE the State of Missouri requests that it be granted intervention on the above referenced matter.

Respectfully Submitted,

JEREMIAH W. (JAY) NIXON

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The undersigned hereby certifies that on the 10<sup>th</sup> day of July, 2006, the original of the foregoing was hand delivered or sent via 1<sup>st</sup> class, postage paid, U.S. Mail to:

Steven R. Sullivan, Sr. V.P. General Counsel & Secretary Thomas Byrne, Managing Associate General Counsel Ameren Services Company P.O. Box 66149 (MC1310) St. Louis, Missouri 63166-6149

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