

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

In the Matter of the Union Electric Company d/b/a)
Ameren Missouri’s 2015 RES Compliance Report and) Case No. EO-2016-0286
Its 2016-2018 RES Compliance Plan)

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

Comes now the Missouri Industrial Energy Consumers (“MIEC”) and, pursuant to 4 C.S.R. 240-2.075 and this Commission’s April 21, 2016, *Order Establishing Time to Respond*, files its application to intervene. For its application, the MIEC states 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 Ameren Missouri (“Ameren Missouri”).

2. As large industrial customers of Ameren Missouri, the MIEC’s interest is different than that of the general public and may be adversely affected by a final order arising from this case.

3. The MIEC has been active in all aspects of RES compliance, including participation in RES rulemaking.

4. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

5. The MIEC’s intervention 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,

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By: /s/ Diana Vuylsteke

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Attorneys for the Missouri Industrial
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 26th day of April, 2016, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke