VOICE Missouri Retailers Association

RETAILING

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FILED⁴ SEP 0 8 2006

Missouri Public Service Commission

Post Office Box 1336 Jefferson City, MO 65102

September 7, 2006

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

RE: Union Electric Company d/b/a AmerenUE Case Nos: ER-2007-0002

Dear Ms. Dale:

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

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

Sincerely,

Samuel E. Overfelt

Attorney

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BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

SEP 0 8 2006

Service Commission

FILED⁴

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.)

Case No. ER-2007-0002

<u>Missouri Retailers Association's Late Filed</u> <u>Application to Intervene</u>

Comes Now the Missouri Retailers Association (MRA) and pursuant to 4 C.S.R. 240.2-070 of the Missouri Public Service Commission's Rules of Practice and Procedure, the MRA hereby files its Late Filed Application to intervene in the above-referenced matter. In support of its Application, MRA respectfully states as follows:

- On July 7, 2006 Union Electric Company d/b/a AmerenUE (hereinafter UE) filed tariffs designed to increase its electric rates by approximately \$360.7 million. The MRA is composed of retailers who represent a cross section of businesses within the State of Missouri. The MRA was organized in 1933 by court order in the Circuit Court of the City of St. Louis, with a present office in Jefferson City, Missouri. Over a period of many years MRA has purchased substantial amounts of electricity from UE and other utility companies in the State of Missouri.
- 2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct significant impact on MRA's cost of energy service

and the manner in which it is supplied. Therefore, granting this proposed intervention to the MRA would serve the public interest.

- 3. It is MRA's position that their interests may be adversely affected by the transactions proposed herein. As large and small user customers of UE, the MRA has a direct and immediate interest in these proceedings that is different from that of the general public.
- 4. Good cause exists for granting this late filed application inasmuch as MRA was unable to determine whether or not it should intervene in this rate case proceeding prior to the initial intervention deadline. MRA is filing this intervention request as soon as possible after the decision to intervene.
- 5. Granting MRA's requested late filed intervention would serve the public interest.
- Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Samuel E. Overfelt, Esq. Law Office of Samuel E. Overfelt 618 East Capitol Avenue P.O. Box 1336 Jefferson City, MO 65102 WHEREFORE, having stated the grounds for intervention and the position and interest of the MRA in these proceedings, the MRA ask that the Commission grant this Late Filed Application to Intervene, and thereby entitle MRA to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,

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Attorney for Missouri Retailers Association

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of September, 2006, a copy of the original of the foregoing was served via first class U.S. mail, postage prepaid, on the following parties of record:

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