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

In the Matter of Ameren Missouri's	)	
2017 Utility Resource Filing Pursuant to	)	Case No. EO-2018-0038
4 CSR 240 - Chapter 22	)	

## 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 September 25 *Order Directing Notice and Setting Deadline for Intervention*Requests, files its application to intervene. For its application, the MIEC states as follows:

- 1. The MIEC is a Missouri nonprofit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial customers of Ameren Missouri ("Ameren").
- 2. As a representative of large industrial customers of Ameren, 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 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.
- 4. The MIEC's intervention will serve the public interest by assisting the Commission's record for decision in this case.
  - 5. No party will be prejudiced by MIEC's intervention.

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/ Lewis Mills

Lewis R. Mills, #35275 Edward F. Downey, # 28866 221 Bolivar Street, Suite 101 Jefferson City, MO 65101 Telephone: (573) 556-6620

Facsimile: (573) 556-6630

E-mail: efdowney@bryancave.com lewis.mills@bryancave.com

Diana M. Vuylsteke, # 42419 211 N. Broadway, Suite 3600 St. Louis, Missouri 63102 Telephone: (314) 259-2543

Facsimile: (314) 259-2020

E-mail: dmvuylsteke@bryancave.com

Attorneys for the Missouri Industrial **Energy Consumers** 

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 2<sup>nd</sup> day of September, 2017, to all parties on the Commission's service list in this case.

/s/ Lewis Mills