



ATTORNEY GENERAL OF MISSOURI

JEREMIAH W. (JAY) NIXON  
ATTORNEY GENERAL

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November 7, 2001

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Public Service Commission  
Governor's Office Building  
Madison & E. Capitol  
Jefferson City, MO 65101

**FILED<sup>3</sup>**

NOV 07 2001

Missouri Public  
Service Commission

RE: Staff of the Public Service Commission v. Union Electric Company, d/b/a  
AmerenUE, Case No. EC-2002-1

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are the original and 8 copies of the  
State of Missouri's Application to Intervene. Thank you for your attention to this matter.

Sincerely,

JEREMIAH W. (JAY) NIXON  
Attorney General

Ronald Molteni  
Assistant Attorney General

mlw

Enclosures

cc: All Parties on the Service List

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>  
NOV 07 2001

Staff of the Missouri Public Service Commission,

Complainant,

v.

Union Electric Company,  
d/b/a AmerenUE,

Respondent.

Missouri Public  
Service Commission

Case No. EC-2002-1

THE STATE OF MISSOURI'S  
APPLICATION TO INTERVENE

The State of Missouri, through the Attorney General, seeks to intervene in order to protect its interest in having rational, reasonable, and fair electrical rates available to its many agencies and officials. The State submits this application to intervene pursuant to 4 CSR 240-2.075. In support of its application, the state of Missouri states:

1. Jeremiah W. (Jay) Nixon is the duly elected Attorney General of the state of Missouri and, as such, is authorized by law, Chapter 27 RSMo., to appear and intervene on behalf of the state of Missouri in any proceeding in which the state's interest may be involved.

2. The state of Missouri and its constituent agencies, departments, and institutions (collectively referred to as the "State") are major customers of AmerenUE and the procurement of services from AmerenUE for the state of Missouri is made entirely of public funds, thereby necessitating state intervention. In addition, certain state departments, such as the Department of Natural Resources, through its Energy Center, have statutory

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responsibilities pursuant to § 640.150 to develop policies that are affected by AmerenUE's rates and energy consumption.

3. Because the State is a major customer of AmerenUE and because of the responsibilities certain State departments have that are affected by AmerenUE's rates, the State has a significant interest in this matter, distinguishable from that of the general public, which cannot be protected adequately by any other party to this proceeding. The State has a definite interest in rates charged for electric service which affect its daily operation.

4. The State, therefore, adequately satisfies the relevant standards for intervention within 4 CSR 240-2.075.

5. The Commission has not yet set a deadline for intervention. Accordingly, the granting of this application will in no way delay this proceeding nor unduly expand its scope.

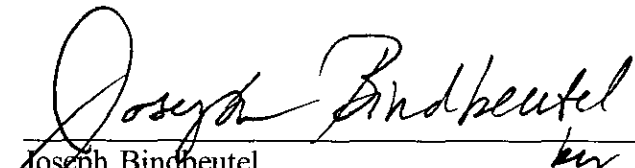
6. There is insufficient information currently available to identify individual issues that may arise in this case that may affect the State's interests. Accordingly, the State reserves the right to take a position and participate with regard to any matter or issue arising in this case that may affect the State's interests.

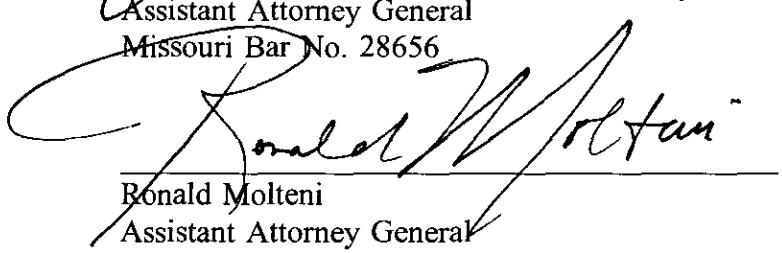
7. If this application to intervene is granted, the state of Missouri requests that a copy of each document filed by any party to this proceeding be mailed or delivered to Ronald Molteni/Joseph Bindbeutel, Assistant Attorneys General, Supreme Court Building, 207 West High Street, P.O. Box 899, Jefferson City, Missouri 65102.

WHEREFORE, the state of Missouri respectfully requests the Commission grant this application to intervene.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General

  
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Attorneys for State of Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was hand-delivered or mailed, postage prepaid, this 7th day of November, 2001 to:

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Dennis Frey  
General Counsel's Office  
Missouri Public Service Commission  
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John Coffman  
Martha Hogerty  
Public Counsel  
Governor Office Building, Suite 650  
Jefferson City, MO 65101

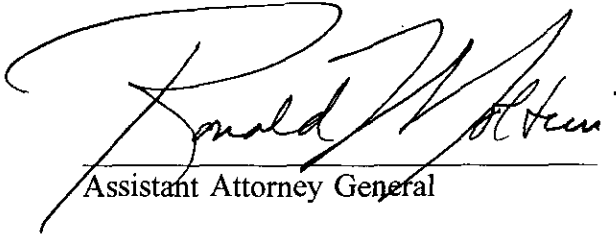
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