

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

NOV 29 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

APPLICATION TO INTERVENE OF THE
MISSOURI RETAILERS ASSOCIATION

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, the Missouri Retailers Association, hereinafter referred to as "Applicant" hereby apply for leave to intervene in the above-referenced proceeding. In support of the Application, Applicant respectfully states as follows:

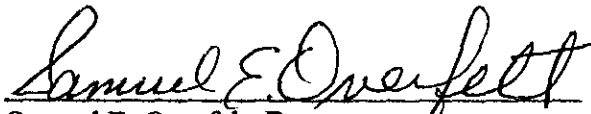
1. Applicant is composed of retailers who represent a cross section of businesses within the State of Missouri. Applicant was organized in 1933 by court order in the Circuit Court of the City of St. Louis, with a present office in Jefferson City, Missouri. Over a period of many years Applicant has purchased substantial amounts of electricity from Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") 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 Applicants' cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicant would serve the public interest.
3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. As large and small user customers of AmerenUE, the Applicant has a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants do not at this time have sufficient information to assert a position on the Staff's Complaint, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, testimony and exhibits of other parties filed and to be filed herein.
4. 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 Applicant in these proceedings, Applicant ask that the Commission grant this Application for Intervention, and thereby entitle said Applicant 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

I hereby certify that a copy of the foregoing was served via first class U.S. mail, postage prepaid, on the 29th day of November 2001, on the following parties of record:

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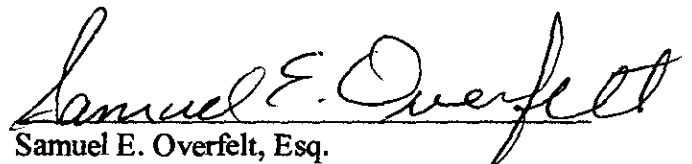
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