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IN ASSOCIATION WITH BRYAN CAVE,  
A MULTINATIONAL PARTNERSHIP.  
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July 5, 2001

**By Hand Delivery**

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Case No. ~~EO-2001-1~~ <sup>EO-2002-1</sup>

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of the Application to Intervene of the Missouri Industrial Energy Consumers ("MIEC").

Thank you for your assistance in bringing this filing to the attention of the Commission

Very truly yours,



Diana M. Vuylsteke

DMV:dv  
Enclosures  
cc: Office of the General Counsel  
Office of the Public Counsel  
James J. Cook, Ameren Services

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

JUL 05 2001

Missouri Public  
Service Commission

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

**FILED<sup>3</sup>**  
JUL 05 2001

Missouri Public  
Service Commission

Staff of the Missouri Public Service  
Commission,

Complainant,

v.

Union Electric Company, d/b/a  
AmerenUE,

Respondent.

Case No. EC-2002-1

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

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Holnam, Hussmann Refrigeration, ISP Minerals, Mallinckrodt, Inc., MEMC Electronic Materials, Monsanto Company, Precoat Metals, Procter & Gamble Manufacturing, Ralston Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

1. The MIEC is a group of large customers of Union Electric Company d/b/a AmerenUE (hereafter "UE"), and the rates, terms and conditions of the MIEC's electric service will be affected by the outcome of this case;
2. The MIEC's interest in this case is to ensure that UE provides electric service to the MIEC under reasonable terms and conditions at just and reasonable rates;
3. As a group of large customers of UE, the MIEC's interest in this proceeding is different than that of the general public;

4. The MIEC does not yet have sufficient information to take a position regarding the Commission Staff's Complaint, but reserves the right to take positions on all issues that may affect its members in this case.
5. Granting the MIEC's proposed intervention would serve the public interest by assisting in the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been hand-delivered to the Office of the General Counsel and the Office of the Public Counsel and will be mailed to counsel for Union Electric Company this 5th day of July, 2001.

*Diana M. Vuylsteke*