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July 12, 2001

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

**FILED<sup>3</sup>**  
JUL 13 2001  
Missouri Public  
Service Commission

Re: Staff Complaint Against AmerenUE  
Case No. EC-2002-1

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Application to Intervene in the above-referenced case. I would appreciate your bringing this filing to the attention of the Commission.

I also enclose one (1) extra copy of the document with the request that it be file stamped and returned to the undersigned in the enclosed self-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (11)  
cc/enc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>

JUL 13 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 ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, DaimlerChrysler Corporation, The Doe Run Company, Emerson Electric Company, Lone Star Industries Inc., River Cement Company, SSM HealthCare, and St. John's Mercy Health Care (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. Applicants own and operate not-for profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have 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 Applicants would serve the public interest.

3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. As large user customers of AmerenUE, the Applicants have 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.

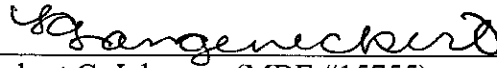
4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Robert C. Johnson, Esq.  
Lisa C. Langeneckert, Esq.  
Law Office of Robert C. Johnson  
720 Olive Street, Suite 2400  
St. Louis, MO 63101

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants 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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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EO-2001-684

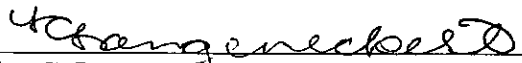
Dated at St. Louis, Missouri this 12th day of July, 2001:

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