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December 22, 2000

Mr. Dale Roberts  
Secretary and Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

FILED<sup>3</sup>  
DEC 22 2000 PB

Missouri Public  
Service Commission

Re: Ameren/UE Application for Order Authorizing the Sale, Transfer, and  
Assignment of Certain Assets to Central Illinois Public Service Company  
Case No. EM-2001-233

Dear Mr. Roberts:

Enclosed for filing are the original and eight copies of the Application to Intervene on behalf of the Missouri Energy Group: Barnes-Jewish Hospital, DaimlerChrysler Corporation, The Doe Run Company, Emerson Electric Company, Lone Star Industries, Inc., River Cement Company, SSM HealthCare, and Unity Health System in the above-referenced case.

An additional copy of the Application is enclosed, with the request it be file-stamped and returned to the undersigned.

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

Yours very truly,

*Langeneckert* BW

Lisa C. Langeneckert

Enclosures (10)  
cc: All parties of record

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

FILED<sup>3</sup>  
DEC 22 2000 PB

Missouri Public  
Service Commission

In the Matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for )  
An Order authorizing the sale, transfer, )  
And assignment of Certain Assets, Real )  
Estate Leased Property, Easements and )  
Contractual Agreements to Central Illinois )  
Public Service Company (d/b/a AmerenCIPS) )  
And, in connection therewith, certain other )  
Related transactions )

Case No. EM-2001-233

**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 Unity Health System (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 and other utility companies in the state of Missouri.

2. The matters to be considered in this docket 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. In addition the Commission's decisions and rulings herein may establish precedent for restructuring of electric utilities in the state of

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Missouri and thereby affect all utility customers in the state of Missouri. 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. The Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants cannot assert a position on specific matters because they have insufficient information, 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.

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. EM-2001-233

Dated at St. Louis, Missouri this 22nd day of December, 2000:

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