WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
JEFFERSON CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
SANTA MONIGA, CALIFORNIA
IRVINE, CALIFORNIA

BRYAN CAVE LLP

ONE METROPOLITAN SQUARE
211 NORTH BROADWAY, SUITE 3600
ST. LOUIS, MISSOURI 63102-2750
(314) 259-2000

FACSIMILE: (314) 259-2020

RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
SHANGHAI, PEOPLE'S REPUBLIC OF CHINA
IN ASSOCIATION WITH BRYAN CAVE,
A MULTINATIONAL PARTNERSHIP.
LONDON, ENGLAND

FILED

OCT 26 2000

Missouri Public Service Commission

INTERNET ADDRESS

DMVUYLSTEKE@BRYANCAVE.COM

DIANA M. VUYLSTEKE

DIRECT DIAL NUMBER (314) 259-2543

October 24, 2000

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. EM-2001-233

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of the Missouri Industrial Energy Consumers' Application to Intervene. Also enclosed is an additional copy to be file-stamped and returned to me in the enclosed self-addressed, stamped envelope.

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

Very truly yours,

Jeane Vuyloteke Diana M. Vuylsteke

DMV:dv

cc:

All Parties of Record

Mr. Maurice Brubaker

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



In the Matter of the Application of Union)	201 2 0 2000
Electric Company (d/b/a AmerenUE) for)	Service Commission
an order authorizing the sale, transfer and)	Service Commission
assignment of certain Assets, Real Estate)	40.01
Leased Property, Easements and)	Case No. EM-2001-233
Contractual Agreements to Central Illinois)	
Public Service Company)	
(d/b/a AmerenCIPS) and, in connection)	
therewith, certain other related transactions)	

APPLICATION TO INTERVENE

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch Companies, The Boeing Company, Ford Motor Company, General Motors Corporation, Holnam, Hussmann Refrigeration, Mallinckrodt, MEMC Electronic Materials, Monsanto, Procter & Gamble Manufacturing, and Ralston Purina, 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:

- The MIEC is a group of large customers of Union Electric Company; 1.
- 2. Union Electric Company's filing in this case could impact the rates and terms and conditions of service of its large customers.
- 3. As an organization of large customers, the MIEC's interest in this case is different than that of the general public.
- 4. The MIEC does not yet have sufficient information to take a position regarding Union Electric Company's application, but reserves the right to take positions on all issues that may affect its members in this case.
- Granting the MIEC's proposed intervention would serve the public interest by 5. assisting 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

Diana M. Vuylsteke, #42419

211 N. Broadway, Suite 3600

St. Louis, Missouri 63102

Telephone: (314) 259-2543 Facsimile: (314) 259-2020

Trana Viylsteke

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the Commission's official service list this 24th day of October, 2000.