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August 9, 2004

**FILED**

AUG 09 2004

EUGENE E. ANDERECK (1923-2004)  
GREGORY C. STOCKARD (1904-1993)  
PHIL HAUCK (1924-1991)

Secretary  
Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Missouri Public  
Service Commission

Re: In the Matter of the Application of Union Electric Company d/b/a Ameren UE for a Sale of Utility Assets by Union Electric Company d/b/a AmerenUE to Citizens Electric Corporation  
Cae No. EO-2005-0034

Dear Secretary:

Enclosed for filing please find an original and eight copies of Citizens Electric Corporation's Motion to intervene in the above referenced case.

If you have any questions, please contact me at the number listed above.

Sincerely,

*Lisa Chase*  
Lisa Cole Chase

LCC:lw

Encl.

CC: General Counsel, OPC  
General Counsel, PSC  
David B Hennen  
Citizens Electric Corporation

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 09 2004

Missouri Public  
Service Commission

In the Matter of the Application of Union Electric )  
Company d/b/a AmerenUE for Commission )  
Approval for a Sale of Utility Assets by ) Case No. EO-2005-0034  
Union Electric Company d/b/a AmerenUE to )  
Citizens Electric Corporation. )

**MOTION TO INTERVENE**

COMES NOW Citizens Electric Corporation, pursuant to 4 CSR 240-2.075 and for its' Motion to Intervene states as follows:

1. Union Electric Company d/b/a AmerenUE filed its application on July 30, 2004 with the Commission for approval of the sale of utility assets from AmerenUE to Citizens Electric Corporation ("Citizens"). AmerenUE attached a form of the Asset Purchase Agreement, a map illustrating the location of Line Sections A & B, and a copy of the 1988 Wholesale Electric Service Agreement as amended on March 22, 1993 to its Application.

2. Citizens files this Motion to Intervene in support of AmerenUE's Application for approval of the sale of utility assets from AmerenUE to Citizens, and to provide the Commission with additional information it may need from Citizens as purchaser under the Asset Purchase Agreement ("Purchase Agreement"). As a party to the Agreement, Citizens has an interest which is different from that of the general public and which may be adversely affected by a final order arising from this case.

WHEREFORE, on the basis of the foregoing, Citizens respectfully requests that it be allowed to intervene to provide additional information, if needed, and to protect its interests in this proceeding.

Sincerely,

ANDERECK, EVANS, MILNE,  
PEACE & JOHNSON, L.L.C.

By Lisa Chase

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ATTORNEYS FOR CITIZENS  
ELECTRIC CORPORATION

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was hand-delivered, and/or mailed, postage prepaid, on this 9<sup>th</sup> day of August, 2004, to:

General Counsel's Office  
Missouri Public Service Commission  
200 Madison Street, P.O. Box 360  
Jefferson City, MO 65102

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, P.O. Box 2230  
Jefferson City, MO 65102

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Lisa Cole Chase