

To: Commissioners

Mr. Rubie Err. Comm.

7110 Washington Ave

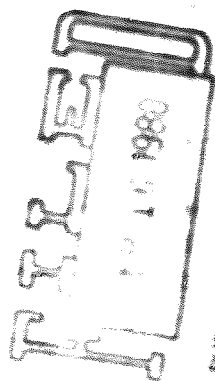
University City, Mo

11 September, 1980

MOTION TO INTERVENE IN CASE
ER 80-190.

The undersigned has specialized knowledge, materials, documents, facts, and exhibits materially relating to the above case, to wit:

1. The economic impact of the proposal to eliminate the lights.
2. The illumination performance of proposed and present fixtures.
3. The performance, attitude and dealings of Union Electric in selling and maintaining street lights.
4. The performance, attitude and dealings of Union Electric in the conversion of a highly



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4. (Cont'd) valuable set of antique streetlights in University City (and a similar set in Richmond Heights) to mercury H.P.
5. The mining practices of Union Electric versus that of private Contractors, which gives this company a huge economic advantage in bidding and maintaining streetlighting.

None of the above facts seem to have been elicited by the Commission staff, nor have the staff contacted any of the customers or cities affected. For these reasons, and on the value of the testimony the undersigned can supply, the undersigned respectfully pleads

MOTION TO INTERVENE
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J. CARL, page 2

he be allowed to intervene
in Case E R 80-190

James Lee Carl
JAMES LEE CARL
11 SEP, 1980

CC: UNION ELECTRIC, LEGAL DEPT.
UNIVERSITY CITY

710 Washington Ave
University City, Mo. 63130
11 September, 1980

O. Michael Heust, Secy.
Mo. Public Service Comm.
P. O. Box 360
Jefferson City, Mo. 65102

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SEP 12 1980

MISSOURI
PUBLIC SERVICE COMMISSION

Dear Sir:

I have enclosed a motion to
intervene in Case ER-80-190.

I have specialized knowledge,
documents, ^{exhibits} and information
relating to Union Electric's
performance as a supplier
of street lighting service.
Apparently, none of the
Commission's staff have
reviewed the material or
facts I will supply.

Yours very truly
James L. Carl
JAMES L. CARL