

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

In the Matter of Aquila, Inc. d/b/a	)	
Aquila Networks – MPS and Aquila Networks -	)	Case No. EO-2003-0566
L&P’s Application to Join the Midwest	)	
Independent System Operator, Inc.	)	

**APPLICATION OF UNION ELECTRIC COMPANY  
d/b/a AMERENUE TO INTERVENE**

COMES NOW Union Electric Company, d/b/a AmerenUE (“AmerenUE” or “Company”), by and through its counsel, and pursuant to Rule 4 CSR 240-2.075 of the Public Service Commission of Missouri (“Commission”), hereby seeks authority to intervene in this proceeding. In support of its Application To Intervene, AmerenUE states as follows:

1. AmerenUE is an electric utility regulated by the Commission which operates in the City of St. Louis, St. Louis County and significant portions of the eastern half of the State of Missouri, as well as in other areas of this and other states.
2. On June 20, 2003, Aquila, Inc. d/b/a Aquila Networks-MPS and Aquila Networks-L&P (“Aquila”) filed an application with the Commission seeking to join the Midwest Independent Transmission System Operator, Inc. (MISO). Aquila has indicated that it has filed an application with the Federal Energy Regulatory Commission (FERC) to transfer operational control over certain designated transmission facilities to the MISO pursuant to Section 203 of the Federal Power Act. Aquila is seeking a Commission order that, among other things: 1) authorizes Aquila to perform in accordance with the terms of the agreement contained in the FERC application; and 2) acknowledges that the

Commission will consider all of the FERC-approved administrative fees that Aquila is assessed and all costs that Aquila incurs from the MISO to make prudent purchases of capacity and/or energy to serve its bundled retail load under the agreement to be prudently incurred expenses that will be included by the Commission in the cost of service for ratemaking purposes for bundled retail customers in Aquila's next general rate case.

3. AmerenUE has a pending case before the Commission whereby AmerenUE has requested Commission authority to participate in the MISO through a contractual arrangement with GridAmerica. As a result, the issues in this case could have a bearing on the outcome of AmerenUE's pending case before the Commission. Moreover, AmerenUE's interest in this proceeding is different from that of the general public.

4. AmerenUE supports the requests made by Aquila in its application in this case.

WHEREFORE, based upon the foregoing, AmerenUE requests that the Commission grant this Application To Intervene and allow AmerenUE to participate

fully in all proceedings in this case with all rights and privileges accorded to a party.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By: David B. Hennen

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DATED: 7/11/03

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via electronic mail or first class U.S. mail, postage prepaid, on this 11th day of July, 2003, on the following parties of record:

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