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May 7, 2001

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65101

FILED

MAY 9 2001

Missouri Public
Service Commission



Re: In the Matter of the Joint Application of Gateway Pipeline Company, Inc.,
Missouri Gas Company and Missouri Pipeline Company
MPSC Case No. GM-2001-585

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its Application to Intervene.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Thomas M. Byrne".

Thomas M. Byrne
Associate General Counsel

TMB/dla
Enclosures

cc: MPSC General Counsel
Office of the Public Counsel

FILED

MAY 9 2001

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc.,)
Missouri Gas Company and Missouri)
Pipeline Company.)

Case No. GM-2001-585

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

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, AmerenUE states as follows:

1. AmerenUE is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office located at 1901 Chouteau Avenue, St. Louis, Missouri 63103, and is a public utility as defined in Section 386.020 RSMo. (1996). AmerenUE is engaged in providing electric and gas service in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). AmerenUE is also engaged in providing electric and gas service in portions of Illinois.

2. In this proceeding Gateway Pipeline Company, Inc. ("Gateway"), Missouri Gas Company ("MGC") and Missouri Pipeline Company ("MPC") have filed a joint application asking the Commission to find that it lacks jurisdiction to approve Gateway's proposed acquisition of all the outstanding shares of capital stock of UtiliCorp Pipeline Systems, Inc., the non-regulated parent of both MGC and MPC. In the alternative, the applicants request that the Commission approve this proposed transaction pursuant to Section 393.190(2) RSMo. 2000.

3. AmerenUE is requesting permission to intervene in this proceeding because it is a customer of MPC that utilizes MPC's pipeline facilities to transport a portion of the natural gas supplies it uses to serve customers in its Missouri service area. Supplies obtained by AmerenUE through MPC's facilities are particularly critical to serve the Company's customers located in Central and Eastern Missouri on peak days. As a consequence, AmerenUE has a direct and substantial interest in ensuring that MPC and its owners are willing and able to provide the service that AmerenUE has contracted to receive. Because AmerenUE obtains a critical portion of its peak day gas supplies through the use of MPC's pipeline facilities, AmerenUE's interest in this matter is different from that of the general public and it may be adversely affected by a final order arising from this case. At this point in the proceeding, AmerenUE has not determined whether it will support or oppose the relief sought by the Applicants.

WHEREFORE, for the foregoing reasons, AmerenUE requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a AmerenUE

By: 

Its Attorney

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Application to Intervene in Case No. GM-2001-585 was served on the following via overnight delivery on this 7th day of May 2001:

Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65102

James C. Swearengen
Brydon Swearengen & England, PC
312 E. Capitol Avenue
Jefferson City, MO 65101-3055

A handwritten signature in black ink, appearing to read "Thomas M. Byrne", is written over a horizontal line.

Thomas M. Byrne