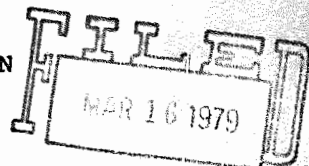


BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI



In the matter of the application )  
of UNION ELECTRIC COMPANY for )  
permission and authority to con- )  
struct, operate, and maintain ) EA-79-119  
two combustion turbine generating )  
units in the State of Missouri )

APPLICATION FOR LEAVE TO PARTICIPATE  
WITHOUT INTERVENTION

Comes now the Missouri Department of Natural Resources,  
by its attorneys, John Ashcroft, Attorney General of Missouri,  
and Daniel F. Lyman, Assistant Attorney General, and in support  
of its application for leave to participate without intervention,  
pursuant to 4 CSR 240-2.110(M) states the following:

1. The name, title, and mailing address of the person  
to whom communications in this matter are to be addressed is:

The Honorable John Ashcroft  
Attorney General of Missouri  
c/o Daniel F. Lyman  
Assistant Attorney General  
P. O. Box 899  
Jefferson City, Missouri 65102

2. The Missouri Department of Natural Resources was  
created under authority of Article IV, sections 12 and 47  
of the Constitution of the State of Missouri to administer  
programs of the State relating to environmental control and  
the conservation and management of natural resources.

3. In order to effect the mandate of Article IV of the  
Constitution of the State of Missouri the Division of Policy  
Development was created which, through the Missouri Energy  
Program, is empowered to manage effectively State energy  
supply and distribution problems pursuant to an Executive Order  
of November 8, 1977. Moreover, the Air Pollution Control  
Program of the Missouri Department of Natural Resources is  
staffed with specialists in the area of design, operation, and  
maintenance of electrical power generating facilities.

4. The application of Union Electric Company proposes  
that the company construct, operate, and maintain two oil-fired  
combustion turbine generating units on a site located at Union

(6)

Electric Company's Meramec power plant property at 8200 Fine Road, St. Louis County, Missouri.

5. The Missouri Department of Natural Resources seeks participation without intervention in an effort to determine the convenience and necessity of installing two oil-fired combustion turbine generating units in light of load forecasts and general energy conservation concerns, as well as in an effort to explore alternative measures such as demand limiting and redistribution or power generation through other energy sources.

6. The Missouri Department of Natural Resources requests leave to participate without intervention to the following degree: To be served with copies of the case papers including, but not limited to, all pleadings, transcripts, prefiled testimony and exhibits.

WHEREFORE the Missouri Department of Natural Resources requests that the Commission enter an order granting its application for leave to participate without intervention to the degree described herein.

Respectfully submitted,

JOHN ASHCROFT  
Attorney General

  
Daniel F. Lyman  
Assistant Attorney General

P. O. Box 899  
Jefferson City, Missouri 65102  
(314) 751-3321

Attorneys for Missouri Department of  
Natural Resources

STATE OF MISSOURI       )  
                                  )   SS.  
CITY OF JEFFERSON CITY)

Daniel F. Lyman, being first duly sworn, on his oath and in his capacity as counsel for the within applicant for intervention, states that he has knowledge of the matters stated in this Application for Intervention and that said matters are true to the best of his knowledge, information and belief.

  
DANIEL F. LYMAN

Subscribed and sworn to before me this 16<sup>th</sup> day of March, 1979. Notary Public, Commissioned in Cole County, Missouri.

  
Notary Public

My commission expires:

Dec 14, 1980

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this 16<sup>th</sup> day of March, 1979, to:

Mr. Michael F. Barnes, Esq.  
Union Electric Company  
1901 Gratiot Street  
P. O. Box 149  
St. Louis, MO 63166

Mr. William Barvick  
Public Counsel of Missouri  
100 E. Capitol  
Jefferson City, MO 65101

and

Mr. Herman Barken  
Associate County Councilor  
St. Louis County  
7900 Forsyth  
St. Louis, MO 63105

  
DANIEL F. LYMAN