

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

In re: Union Electric Company's 2005)	
Utility Resource Filing pursuant to)	Case No. EO-2006-0240
4 CSR 240—Chapter 22)	

**LATE-FILED APPLICATION TO INTERVENE
OF THE MISSOURI ENERGY GROUP**

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Holcim US, Inc., and SSM Health Care (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants" or "MEG"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. The MEG is an ad hoc group of not-for-profit hospital systems and large industrial companies located within the state of Missouri that have purchased substantial amounts of electricity from Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") and other utility companies in the state of Missouri. The MEG has actively participated in previous cases involving AmerenUE before the Public Service Commission ("Commission").

2. The matters to be considered in this case and the determinations of the Commission thereon, could have a direct and significant impact on Applicants' cost of energy service, the reliability thereof, and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest.

3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. As large-use customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public and cannot be adequately represented by any other party. While Applicants do not at this time have sufficient information to assert a position on AmerenUE's IRP filing, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, testimony and exhibits of other parties filed and to be filed herein.

4. Applicants only became aware of AmerenUE's December 5, 2005 filing in this case late in the day on January 10, 2006. A review of the Commission's *Order Directing Notice, Setting Date for Submission of Intervention Requests, and Scheduling a Prehearing Conference* indicates that all parties to EC-2002-1 should receive a copy of the Commission's notice. While Applicants were a party to EC-2002-1 and have participated in AmerenUE cases for over twenty years, no notice of the filing of this case was received from either the Commission or AmerenUE. In addition, Applicants are not listed on the service list on EFIS in this case.

5. Applicants suggest that granting this intervention at this time will not hinder or delay the progress of this case and that no other party will be prejudiced by permitting Applicants to intervene late in this case.

6. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

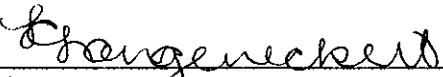
Lisa C. Langeneckert, Esq.
The Stolar Partnership LLP
911 Washington Avenue, Suite 700
St. Louis, MO 63101-1290

WHEREFORE, having stated the grounds for intervention and the position and interest of

the Applicants in these proceedings, Applicants ask that the Commission grant this Late-Filed Application for Intervention, and thereby entitle said Applicants to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,

THE STOLAR PARTNERSHIP LLP



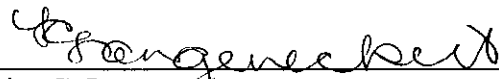
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Attorney for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Docket No. EO-2006-0240 by electronic means or by U.S. mail, postage prepaid.

Dated at St. Louis, Missouri this 10th day of January, 2006



Lisa C. Langeneckert