

LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101
FAX: (314) 588-0638

Robert C. Johnson
DIRECT: (314) 345-6436
[E-MAIL: rjohnson@bspmlaw.com](mailto:rjohnson@bspmlaw.com)

Lisa C. Langeneckert
DIRECT: (314) 345-6441
[E-MAIL: Llangeneckert@bspmlaw.com](mailto:Llangeneckert@bspmlaw.com)

May 21, 2002

Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Staff Complaint Case No. EC-2002-1025
Office of Public Counsel Complaint Case No. EC-2002-1059

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matters, an original and eight (8) copies of its Application to Intervene in each of the two above-referenced cases. An additional copy of each of these documents is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (21)
cc/encs (2): All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Staff of the Missouri Public Service)
Commission)

Complainant,)

v.)

Case No. EC-2002-1025

Union Electric Company, d/b/a)
AmerenUE,)

Respondent.)

APPLICATION TO INTERVENE OF THE
MISSOURI ENERGY GROUP

Pursuant to 4 [C.S.R. 240-2.07 5](#) of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Continental Cement Company, Emerson Electric Company, Lone Star Industries Inc., River Cement Company, SSM HealthCare, and St. John's Mercy Health Care (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

I. Applicants own and operate not-for-profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants 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.

2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct significant impact on Applicants' cost of energy service 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 user customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants do not at this time have sufficient information to assert a position on the Staff's Complaint, 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. In addition, Applicants are parties to Case No. EM-96-149 which is a related case involving the same or similar issues.

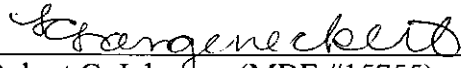
4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Robert C. Johnson, Esq.
Lisa C. Langeneckert, Esq.
Law Office of Robert C. Johnson
720 Olive Street, Suite 2400
St. Louis, MO 63101

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 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,

A handwritten signature in cursive script, appearing to read "Langeneckert", written over a horizontal line.

Robert C. Johnson (MBE #15755)

Lisa C. Langeneckert (MBE #49781)

720 Olive Street, 24th Floor

St. Louis, MO 63101

(314) 588-0638 (fax)

(314) 345-6436 (Robert Johnson phone)

(314) 345-6441 (Lisa Langeneckert phone)

bjohnson@blackwellsanders.com

llangeneckert@blackwellsanders.com

Attorneys 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. EC-2002-1025

Dated at St. Louis, Missouri this 21st day of May, 2002.

John B. Coffman, Esq.
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

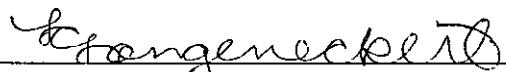
James J. Cook, Esq.
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (M/C 1310)
St. Louis, MO 63166-6149

Steve Dottheim, Esq.
Office of the General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

James Swearengen, Esq.
Brydon, Swearengen & England P.C.
312 East Capitol Ave., P.O. Box 456
Jefferson City, MO 651-2

Robin E. Fulton, Esq.
Schnapp, Fulton, Fall,
McNamara & Silvey L.L.C.
135 East Main Street, Box 151
Fredericktown, MO 63645-0151

Diana M. Vuylsteke, Esq.
Bryan Cave, LLP
211 North Broadway, Suite 3 600
St. Louis, MO 63102-2750



Lisa C. Langeneckert