BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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In the Matter of an Investigation of Union Electric Company d/b/a AmerenUE's Storm Restoration Efforts in the St. Louis Area.

Case No. EO-2007-0037

<u>CITY OF CREVE COEUR, MISSOURI'S</u> <u>APPLICATION TO INTERVENE</u>

COMES NOW the City of Creve Coeur, Missouri (Creve Coeur), pursuant to 4 CSR 240-2.075

and for its Application to Intervene states to the Commission:

1. The City of Creve Coeur is a municipal corporation located in St. Louis County, Missouri,

and organized and existing under the laws of the State of Missouri as a constitutional charter city.

2. All communications and pleadings in this case should be directed to:

Carl J. Lumley Leland B. Curtis Curtis, Heinz, Garrett & O'Keefe, PC 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 314-725-8788 314-725-8789 (FAX) clumley@lawfirmemail.com lcurtis@lawfirmemail.com

3. On or about July 26, 2006, the Commission issued an Order directing Staff to conduct a formal investigation of Union Electric Company d/b/a AmerenUE and any other regulated utilities activities having an impact on storm restoration efforts, including but not limited to AT&T and Missouri American Water Company, concerning the effectiveness of its storm preparation and restoration efforts in Eastern Missouri, which case was assigned Case No. EO-2007-0037, and which Order set an intervention deadline of August 7, 2006.

4. Creve Coeur seeks to intervene in this proceeding because the results of the investigation will affect Creve Coeur's interests as a municipality located in St. Louis County, Missouri, serving the public and individual residents of Creve Coeur.

5. Creve Coeur's interests as a constitutional charter city are different from those of the general public. Furthermore, Creve Coeur's intervention in this proceeding is in the public interest because of Creve Coeur's expertise in serving the public and the residents of the City of Creve Coeur.

6. Creve Coeur supports the Commission investigation in this proceeding.

WHEREFORE, the City of Creve Coeur, Missouri, respectfully requests the Commission to issue its order granting Creve Coeur's Application to Intervene.

CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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Attorneys for the City of Creve Coeur, Missouri

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was emailed to the parties listed below on this 7th day of August, 2006.

/s/ Carl J. Lumley

Carl J. Lumley

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