

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED

OCT 24 2001

Missouri Public  
Service Commission

In the matter of the Joint Application of Union )  
Electric Company and Gascosage Electric )  
Cooperative for an order approving a change in )  
electric supplier for certain Union Electric )  
Company customers for reasons in the public )  
interest; authorizing the sale, transfer, and )  
assignment of certain electric distribution facilities, )  
substations, and easements from Union Electric )  
Company to Gascosage Electric Cooperative; and )  
approving the First Amendment to the Existing )  
Territorial Agreement between Union Electric )  
Company and Gascosage Electric Cooperative )

Case No. EO-2002-178

**VERIFIED APPLICATION OF INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS LOCAL 1455, AFL-CIO, TO INTERVENE**

COMES NOW International Brotherhood of Electrical Workers Local 1455, AFL-CIO ("IBEW Local 1455"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, IBEW Local 1455 states:

1. This matter involves an Application submitted to this Commission by Union Electric Company, d/b/a AmerenUE ("Union Electric"), and Gascosage Electric Cooperative ("Gascosage") for approval to: (1) change the electric supplier for certain Union Electric customers in and around the Cities of Brumley and Ulman from Union Electric to Gascosage; (2) authorize the sale, transfer, and assignment of certain electric distribution facilities, easements, and substations from Union Electric to Gascosage; and (3) amend an existing territorial agreement that was approved by the Public Service Commission by Report and Order in Case No. EO-98-279.

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2. IBEW Local 1455 is a labor organization that represents for purposes of collective bargaining approximately 1000 of Union Electric's employees in primarily clerical and technical classifications, including employees who may be directly affected by the proposed transaction.

3. Although IBEW Local 1455 is, technically, an unincorporated association, labor unions are not required to register their names as fictitious names with the Missouri Secretary of State. Thus, IBEW Local 1455 does not have evidence of any such registration.

4. The principal place of business for IBEW Local 1455 is located at 5570 Fyler Ave., St. Louis, Missouri 63139. The telephone number for IBEW Local 1455 is (314) 351-6300, and its fax number is (314) 351-7356. IBEW's primary electronic mail address is local1455@worldnet.att.net.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Jan Bond  
Attorney at Law  
Diekemper, Hammond, Shinnors,  
Turcotte and Larrew, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
janbond@dhstl.com (E-mail)

6. IBEW Local 1455 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. IBEW Local 1455 does not have any annual reports or assessment fees that are overdue.

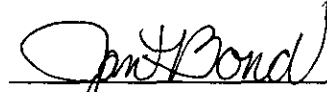
8. IBEW Local 1455 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representative of certain of Union Electric's non-managerial, non-professional employees, IBEW Local 1455 and the employees it represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the dependable delivery of electricity and related products and services at a reasonable cost, IBEW Local 1455 and the employees it represents are additionally concerned with the impact the proposed transactions could have on jobs and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

10. IBEW Local 1455 does not have sufficient information about the proposed transactions to take a position at this time and thus is unsure of the position it will take in this proceeding.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of IBEW Local 1455 and the employees it represents here.

WHEREFORE, International Brotherhood of Electrical Workers Local 1455, AFL-CIO, respectfully asks the Commission to grant this application and to permit IBEW Local 1455 to intervene here.



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JAN BOND, MBN 29227  
DIEKEMPER, HAMMOND, SHINNERS,  
TURCOTTE AND LARREW, P.C.  
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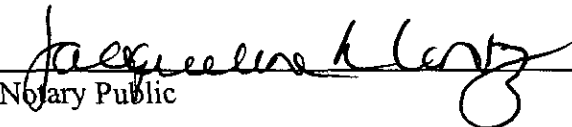
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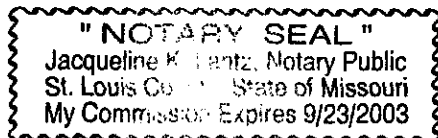
COMES NOW Jan Bond and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Bond further states that she has been authorized to sign and file this application on behalf of International Brotherhood of Electrical Workers Local 1455, AFL-CIO.

  
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JAN BOND

Subscribed and sworn to before me this 23rd day of October, 2001.

My Commission Expires:

  
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Notary Public



**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, postage pre-paid to:

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
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Victor S. Scott, Esq.  
Andereck, Evans, Milne, Peace  
& Johnson  
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Mr. John W. Greenlee  
General Manager  
Gascosage Electric Cooperative  
Post Office Drawer G  
Dixon, Missouri 65459

this 23<sup>d</sup> day of October, 2001.



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