

December 27, 2004

VIA EFIS FILING

Secretary, Chief Regulatory Law Judge Public Service Commission P. O. Box 360 Jefferson City, MO 65102-0360

Re: MoPSC Case No. EA-2005-0180

Dear Mr. Roberts:

Please find included with this EFIS filing the Application to Intervene in the above-referenced case of the Missouri Energy Group. I would appreciate your bringing this filing to the attention of the Commission.

Thank you for your assistance in this matter. Please contact me if you have any questions.

Yours truly,

Lisa C. Langeneckert

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cc/enc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Application of Union Electric Company)	
for a Certificate of Public Convenience and)	
necessity authorizing it to construct, install)	
own, operate, control, manage and maintain)	Case No. EA-2005-0180
electric plant, as defined in §386.020(14) RSMo.)	
to provide electric service in a portion of)	
New Madrid County, Missouri, as an)	
extension of its existing certificated area)	

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, Buzzi Unicem USA, Inc., Emerson Electric Company, Holcim US, Inc., SSM HealthCare, and St. John's Mercy 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 electric from Union Electric Company, d/b/a AmerenUE ("AmerenUE") and have actively participated in previous cases involving AmerenUE before this Commission.

- 2. As large-use customers, the MEG believes that the reliability and the rates and terms and conditions of the electric service of Applicants may be substantially and uniquely affected by the outcome of this docket. MEG's interests in this matter cannot be adequately represented by any other party.
- 3. Applicants do not yet have sufficient information to take a position regarding specific issues raised and to be raised in AmerenUE's application and evidence in this case but reserve the right to take positions on all issues that may affect Applicants.
- 4. Granting intervention by Applicants in this case will serve the public interest by assisting the Commission in developing a more complete record for its decision; and
- 5. Correspondence or communications regarding this application, including service of all notices and orders of this Commission shall be addressed to:

Lisa C. Langeneckert, Esq. The Stolar Partnership LLP 911 Washington Avenue St. Louis, MO 63101-1290 llangeneckert@stolarlaw.com

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant

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this Application for Intervention and thereby entitle said Applicants to participate fully in this proceeding.

Respectfully submitted,

THE STOLAR PARTNERSHIP LLP

Lisa C. Langeneckert #49781

911 Washington Avenue

St. Louis, MO 63101-1290

314 641-5158

llangeneckert@stolarlaw.com

FAX: 314 436-8400

Attorney for the 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 27th day of December, 2004 caused a copy of the foregoing to be served on all persons on the official service list in Case No. EA-2005-0180.

Lisa C. Langeneckert

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