

JAMES K. COOK
CHARLES A. WERNER
CHRISTOPHER T. HEXTER
MARILYN S. TEITELBAUM
JAMES I. SINGER
LISA S. VANAMBURG
SALLY E. BARKER
ARTHUR J. MARTIN
NEAL M. DAVIS
THOMAS J. GRADY
MARY M. LINDMARK
KEVIN F. FAGAN
ELLIOT M. UCHITELLE

LAW OFFICES

SCHUCHAT, COOK & WERNER
THE SHELL BUILDING, SECOND FLOOR
1221 LOCUST STREET
SAINT LOUIS, MISSOURI 63103-2364

314 621-2626
FAX: 314 621-2378

STANLEY R. SCHUCHAT
(1939-79)
ARTHUR H. NISSENBAUM
OF COUNSEL
MARSAN K. STROMBERG
OF COUNSEL

November 30, 1995

Executive Secretary
Missouri Public Service Commission
301 West High Street
Jefferson City, MO 65102

Re: Case No. EM-96-149

Dear Sir or Madam:

Enclosed for filing with the Commission are the original and 14 copies each of applications to intervene on behalf of Intervenor Local 2, International Brotherhood of Electrical Workers, Local 702, International Brotherhood of Electrical Workers, Local 1455, International Brotherhood of Electrical Workers and Local 309, International Brotherhood of Electrical Workers. Copies of these filings have been served on the parties list on the Commission's service list in this case. Please have extra copies of these pleadings stamped with your receipt stamp and return to me in the enclosed self-addressed, stamped envelope. Thank you for your assistance.

Sincerely,

Marilyn S. Teitelbaum
Marilyn S. Teitelbaum

MST:dk
Enclosures
cc: Mr. Gary Roan
Mr. Mike Datillo
Mr. Jim Berger
Mr. Dave White
All parties

RECEIVED
DEC 4 1995

MO. PUBLIC SERVICE COMMISSION

FILED
DEC 4 - 1995
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION OF THE
STATE OF MISSOURI

In the Matter of)
CENTRAL ILLINOIS PUBLIC SERVICE COMPANY)
CIPSCO, INC.)
UNION ELECTRIC)
Joint application for approval of)
merger and reorganization.)

Case No. EM-96-149

APPLICATION TO INTERVENE

COMES NOW Local 1455, International Brotherhood of Electrical Workers, AFL-CIO ("Local 1455"), by its attorneys and respectfully submits this Application to Intervene pursuant to 4 C.S.R. 240-2.110. In support of this Application, and as grounds therefor, Local 1455 states as follows:

1. Local 1455 is a voluntary labor organization doing business and representing employees in Missouri and Illinois.
2. The name, address and telephone number of the Petitioner seeking Leave to Intervene is:

Mr. Michael Datillo, Business Manager
Local 1455, IBEW
5570 Fyler Avenue
St. Louis, MO 63139
Telephone (314) 351-6300

3. Petitioner requests that service be made to Petitioner and to Petitioner's attorney listed herein.

4. Local 1455 represents employees employed by Union Electric in Missouri and Illinois and is seeking to represent employees of CIPS in Illinois who may be affected by any orders entered by the Commission in this proceeding, and Local 1455 and

FILED
DEC 4 - 1996
MISSOURI
PUBLIC SERVICE COMMISSION

its members are interested in this proceeding. Because Local 1455 may be affected by the Commission's decision in this case, the union has a direct interest in this proceeding that is different from that of the general public.

5. It is the position of Local 1455 that the wages, benefits and terms and conditions of employment of union members, among other things, should not be adversely affected by the Commission's decision in this case.


WHEREFORE, having stated their grounds for intervention, their position and interest in the proceeding, Local 1455, IBEW, ask that the Commission:

- (a) Grant them leave to intervene in this proceeding on their behalf and on behalf of their members and to be heard at such time as the Commission may fix;
- (b) Entitle them to in all respects be parties to the proceeding.

DATED this 30th day of November 1995.

Respectfully submitted,

SCHUCHAT, COOK & WERNER
Attorneys for Local 1455, IBEW


Marilyn S. Teitelbaum (M.B.E. #26074)
1221 Locust Street, Second Floor
St. Louis, MO 63103
(314) 621-2626
FAX: (314) 621-2378

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Application for Intervention was served upon each person on the Commission's official service list by United States mail, first-class, postage prepaid on this 30th day of November 1995:

Mr. Steven R. Sullivan
Attorney for Union Electric Company
1901 Chouteau Boulevard
P.O. Box 149
St. Louis, MO 63166

Mr. Richard W. French
1001 East Cherry, Suite 302
Columbia, MO 65201
Attorney for Intervenor Trigen
St. Louis Energy Corporation

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Mr. Michael Datillo, Business Manager
Local 1455, IBEW
5570 Fyler Avenue
St. Louis, MO 63139



MARILYN S. TEITELBAUM