

JAMES K. COOK  
CHARLES A. WERNER  
CHRISTOPHER T. HEXTER  
MARILYN S. TEITELBAUM  
JAMES J. 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

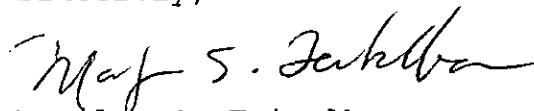
Executive Secretary  
Missouri Public Service Commission  
301 West High Street  
Jefferson City, MO 65102

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

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 )  
 ) Case No. EM-96-149  
Joint application for approval of )  
merger and reorganization. )

APPLICATION TO INTERVENE

COMES NOW Local 309, International Brotherhood of Electrical Workers, AFL-CIO ("Local 309"), 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 309 states as follows:

1. Local 309 is a voluntary labor organization doing business and representing employees in Illinois.
2. The name, address and telephone number of the Petitioner seeking Leave to Intervene is:

Mr. Jim Berger, Assistant Business Manager  
Local 309, IBEW  
2000 Mall Street (Route 157)  
Collinsville, IL 62234  
Telephone (618) 345-5112

**FILED**

DEC 4- 1995

MISSOURI  
PUBLIC SERVICE COMMISSION

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

4. Local 309 represents employees in Illinois employed by Union Electric and CIPSCO who may be affected by any orders entered by the Commission in this proceeding, and Local 309 and its members are interested in this proceeding. Because Local 309 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 309 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 309, 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 30<sup>th</sup> day of November 1995.

Respectfully submitted,

SCHUCHAT, COOK & WERNER  
Attorneys for Local 309, 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 30<sup>th</sup> 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. Jim Berger, Assistant Business Manager  
Local 309, IBEW  
2000 Mall Street (Route 157)  
Collinsville, IL 62234

  
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MARILYN S. TEITELBAUM