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April 26, 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street
Suite 100
P.O. Box 360
Jefferson City, MO 65102-0360

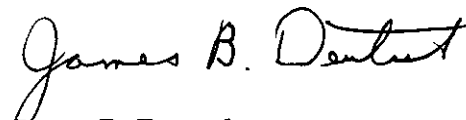
RE: Case No. EO-2002-351
Ameren UE

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of an Application for Intervention on behalf of Mary Claire Kramer.

Copies of this filing have on this date been mailed to counsel of record. Thank you for your attention to this matter.

Sincerely,



James B. Deutsch

JBD:krw

Enclosure

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Application of Union Electric Company)	
for Permission and Authority to Construct,)	
Operate, Own and Maintain a 345 kilovolt)	Case No. EO-2002-351
Transmission Line in Maries, Osage and)	
Pulaski Counties, Missouri)	
("Callaway-Franks Line"))	

APPLICATION FOR INTERVENTION

COMES NOW Mary Claire Kramer, Intervenor, by and through counsel, in accordance with 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case and, in support of this Application for Intervention, respectfully states as follows:

1. Mary Claire Kramer is an individual citizen, taxpayer and owner of certain real property, consisting of approximately 80 acres of land in Pulaski County, 12221 Canyon Road, Dixon, Missouri 65459.

2. The Application for certificate of convenience and necessity in this matter was filed January 18, 2002. By Order dated February 8, 2002, and effective February 18, 2002, the Commission gave notice to various specific parties of the Application and set a deadline for intervention of February 18, 2002. Intervenor did not receive any notice of the Application and was not listed in the Order as one who was intended by the Commission to receive direct notice of the Application.

3. By Order issued March 8, 2002, and effective March 18, 2002, this Commission indicated that no requests for intervention had been received; that a request for public hearing had been received from the Osage County Commission; that any objection to the Application or requests for hearing should be filed by April 15, 2002; and ordered that the PSC Staff file its recommendation

on the Application no later than April 15, 2002.

4. A public hearing was scheduled and held on or about April 22, 2002, as requested by the Osage County Commission, which is how and where Intervenor Kramer learned of the Application and first determined its likely impact on her. By Order of April 22, 2002, effective April 29, 2002, this Commission granted PSC Staff's request for an extension of time to file its recommendation, in order to allow consideration of public comment from the April 22, 2002 public meeting.

5. On information and belief, the transcript of the April 22, 2002, public meeting is not yet prepared and available for review. Additionally, on information and belief, Staff has not presented the Commission with its recommendation. Further, on information and belief, further extension of the procedural schedule in this case may be requested in order for present parties to prepare their positions and recommendations to the Commission.

6. Intervenor Kramer has diligently taken action to intervene in this case once becoming aware of it, and her failure to intervene within the 10 day period provided by the Commission was not due to any fault or neglect on her part. Intervenor therefore has good cause for failure to intervene earlier and requests leave of the Commission to intervene out of time.

7. Intervenor Kramer has a direct interest in this proceeding in that Ameren UE seeks in the above-captioned proceeding before this Commission a certificate authorizing Ameren UE to, inter alia, construct and maintain a proposed new 345 kilovolt transmission line for electricity on, through and over Intervenor's property in a manner which will or may be destructive of Intervenor's property and its value to Intervenor, and may in other regards adversely effect Intervenor personally.

8. No other party to this proceeding can or will adequately represent the interests of

Intervenor Kramer. As the owner and occupant of the aforementioned property, Intervenor Kramer has a unique separate interest in this proceeding which is different from that of the general public. Staff has not yet filed its recommendation and the Office of Public Counsel has not, on information and belief, set forth its position. The granting of intervention to Kramer by this Commission will therefore not hinder or delay the timely completion of this case, will assure a full and fair presentation of all issues relevant to this Commission's duties, powers and authority under Section 393.170, RSMo, and will therefore serve the interests of justice and the public interest.

9. While Intervenor Kramer does not at this time have sufficient information to take a position in this matter, Intervenor believes that this Commission's decisions or orders entered herein will have a potentially adverse impact on this Intervenor which require that she present her position to the Commission pursuant to a reasonable procedural schedule.

5. Intervenor Kramer respectfully submits that this Application meets the criteria for granting intervention set forth in Commission Rule 4 CSR 240-2.075(4), and respectfully requests that this Application to Intervene Out of Time be granted.

6. Please serve all pleadings, correspondence, communications, notices, orders and decisions of the Public Service Commission on Intervenor's counsel as follows:

James B. Deutsch
Henry T. Herschel
308 East High Street
Suite 301
Jefferson City, MO 65101

WHEREFORE, having sufficiently stated grounds for intervention under 4 CSR 240-2.075, Mary Claire Kramer requests this Commission's Order granting leave to intervene as a party in this case and for such other and further orders as to this Commission seem just.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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Attorneys for Mary Claire Kramer

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the above and foregoing document were sent U.S. Mail, postage prepaid, to the following parties of record on this 20th day of April, 2002:

John Coffman
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General Counsel
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