

November 12, 1999

VIA FEDERAL EXPRESS MAIL

FILED³

NOV 15 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman Building
301 W. High Street, 7-N
Jefferson City, MO 65101

Missouri Public
Service Commission



Re: Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed for filing are an original and 14 copies of an Application of Union Electric Company to Intervene in the above-referenced matter.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Please call if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Niehoff", written over a horizontal line.

William J. Niehoff
Attorney

Enclosures

cc: Parties of Record

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

FILED³
NOV 15 1999

In the Matter of the Joint Application of)
UtiliCorp United Inc. and St. Joseph)
Light & Power Company for Authority to)
Merger St. Joseph Light & Power Company)
With and into UtiliCorp United Inc., and, in)
Connection Therewith, Certain Other)
Related Transactions.)

Case No. EM-2000-292 ^{Missouri Public}
_{Service Commission}

APPLICATION OF UNION ELECTRIC COMPANY TO INTERVENE

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE"), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, AmerenUE states as follows:

1. AmerenUE is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office located at 1901 Chouteau Avenue, St. Louis, Missouri 63103, and is an electrical corporation and public utility as defined in Section 386.020, RSMo. (1996). AmerenUE is engaged in providing electric, gas and steam heating services in portions of Missouri as a public utility under the jurisdiction of the Commission. AmerenUE is also engaged in providing electric and gas service in portions of Illinois.

2. In this case, UtiliCorp United Inc. ("UtiliCorp") and St. Joseph Light & Power Company ("SJLP"), among other things, request an order from the Commission authorizing certain merger transactions between UtiliCorp and SJLP.

3. AmerenUE seeks intervention because its transmission system is interconnected with that of UtiliCorp. Also, AmerenUE and UtiliCorp have contiguous service areas in certain parts of the State of Missouri. Further, UtiliCorp intervened in AmerenUE's application for approval of its merger with CIPSCO Incorporated, which was approved by the Commission in

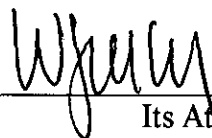
Case No. EM-96-149. Therefore, AmerenUE will or may be directly impacted by the outcome of this proceeding. Furthermore, AmerenUE's interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding.

4. There is insufficient information currently available to identify individual issues that may arise in this case that may affect AmerenUE's interests. Consequently, AmerenUE reserves its right to take a position and participate with regard to any matter or issue arising in this case that may affect AmerenUE's interests.

WHEREFORE, for the foregoing reasons, AmerenUE requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a
AmerenUE

By  _____
Its Attorney

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the following parties of record via first-class, U.S. mail on this 12th day of November, 1999:

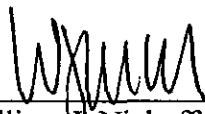
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