



# Missouri Public Utility Alliance

Missouri Association of Municipal Utilities  
Municipal Gas Commission of Missouri  
Missouri Joint Municipal Electric Utility Commission

2407 W. Ash  
Columbia, MO 65203-0045

July 6, 2001

**FILED**

**JUL 9 2001**

**Missouri Public  
Service Commission**

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102

RE: *Union Electric Company (d/b/a AmerenUE)*  
Case No. EO-2001-684

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Application for Intervention of the Missouri Joint Municipal Electric Utility Commission. A copy of the foregoing Application has been mailed today to AmerenUE.

Thank you for your attention to this matter.

Sincerely,

Duncan E. Kincheloe

Enclosures

**FILED**

JUL 9 2001

Missouri Public  
Service Commission

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

**FILED**

JUL 9 2001

Missouri  
Service Commission

In the Matter of the Application of )  
Union Electric Company (d/b/a )  
AmerenUE), for an Order Authorizing )  
It to withdraw from the Midwest ISO )  
to Participate in the Alliance RTO )

**Case No. EO-2001-684**

**APPLICATION FOR INTERVENTION**

COMES NOW the Missouri Joint Electric Utility Commission (MJMEUC) and, in accordance with 4 CSR 240-2.075, 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. The MJMEUC is a political subdivision of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a body corporate and politic of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Fifty-five Missouri municipalities are current parties to the joint contract establishing the MJMEUC.
2. On May 13, 1999, in Case No. EO-98-413, the Missouri Public Service Commission (Commission) approved the participation of Union Electric Company d/b/a/ as AmerenUE in the Midwest Independent System Operator (ISO). On June 11, 2001, AmerenUE filed an application with the Commission requesting authority to withdraw from the Midwest ISO and join the Alliance Regional Transmission Organization.
3. As a wholesale energy and transmission customer of AmerenUE, directly and on behalf of its contracting municipalities, the MJMEUC and its municipalities may be adversely affected by a final order in this matter. Its interests are different from

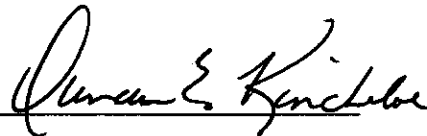
those of the general public and cannot and cannot be adequately represented by any other party. As a joint municipal utility commission with distinctive interests in this case, the public interest would be served by its proposed intervention.

4. At this stage, the MJMEUC is unsure of the position it will take on the various issues that may arise in the instant proceeding.
5. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

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2407 West Ash Street  
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(573) 445-3279  
(573) 445-0680 (FAX)

WHEREFORE, having stated its grounds for intervention, the MJMEUC requests the Commission to enter its Order granting leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,



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COMMISSION