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STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

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In the matter of the Application of Union Electric )  
Company for an order authorizing: (1) certain )  
merger transactions involving Union Electric )  
Company; (2) the transfer of Certain Assets, )  
Real Estate, Leased Property, Easements, and )  
Contractual Agreements to Central Illinois Public )  
Service Company; and (3) in connection )  
therewith, certain other related transactions. )

Case No. EM-96-149

APPLICATION TO INTERVENE

Comes now Trigen-St. Louis Energy Corporation ("Trigen-St. Louis"), by and through its counsel, and for its Application to Intervene hereby states as follows:

1. Trigen-St. Louis is a Missouri Corporation, with its offices in St. Louis, Missouri. Trigen-St. Louis is the owner of the Ashley Plant, which was purchased from Union Electric Company in 1984. Prior to said sale, Union Electric utilized the Ashley Plant to produce steam for a downtown steam loop and electricity for retail sales under the jurisdiction of this Commission. Since its acquisition, the Ashley Plant has been used to generate steam for use in the downtown steam loop, which was purchased from Union Electric by Bi-State Development Agency. This steam distribution system was later transferred to the Solid Waste Management and Development Corporation ("SWMDC"), a Missouri general not-for-profit corporation controlled by the City of St. Louis. Trigen-St. Louis, which recently acquired the Ashley Plant from the original purchaser, Thermal Resources, acts as an agent of SWMDC for the purpose of managing and operating the steam distribution system.

2. Trigen-St. Louis is a wholly-owned subsidiary of Trigen Energy Corporation ("Trigen"). Trigen owns 13 district energy systems producing steam, chilled water and electricity. The interest of Trigen-St. Louis in this docket stems from the following facts:

1) Trigen-St. Louis is a major customer of Union Electric, with an annual peak of around one megawatt, and uses electricity from Union Electric in a manner and amount different from that of the general public, which use could be affected by the proposed merger; 2) Union Electric and Trigen-St. Louis are direct competitors in the energy services market in the St. Louis area and, therefore, Trigen St. Louis has an interest, different from that of the general public, in ensuring that the transactions involved in the proposed merger are just and reasonable and that said transactions will not produce an unfair competitive advantage to Union Electric nor an unfair detriment to the operations of Trigen-St. Louis; and 3) Trigen-St. Louis is a potential cogenerator of electricity and, in that event, would require transmission and other services from Union Electric which could be affected by the proposed merger. Therefore, Trigen-St. Louis has an interest in this docket different from that of the general public.

3. Copies of orders, pleadings and correspondence in this matter should be sent to the following:

Mr. Charles J. Fishman  
President  
Trigen-St. Louis Energy Corporation  
One Ashley Place  
St. Louis, MO 63102

Mr. Richard W. French  
French & Stewart Law Offices  
1001 Cherry St., Suite 302  
Columbia, MO 65201

WHEREFORE, having stated grounds for intervention and interest in this proceeding, Trigen-St. Louis requests that it be granted intervenor status in this case and for such further relief as to this Commission may seem just and proper.

RESPECTFULLY SUBMITTED



Richard W. French 27356  
French & Stewart Law Offices  
1001 Cherry St., Suite 302  
Columbia, MO 65201  
Attorney for Trigen-St. Louis  
Energy Corporation

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served on all parties of record, either by hand-delivery or by placing a copy thereof in the United States mail, postage prepared on this 17<sup>th</sup> day of November, 1995.



Richard W. French