

July 1, 1999

FILED

JUL 2 1999

**VIA FEDERAL EXPRESS**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
P. O. Box 360  
Jefferson City, MO 65102

Missouri Public  
Service Commission

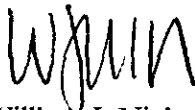
Re: Steam Heating Utilities Affiliate Transactions Rulemaking  
MPSC Case No. HX-99-443

Dear Mr. Roberts:

Enclosed for filing on behalf of Ameren Corporation and Union Electric Company, d/b/a AmerenUE, please find an original and fourteen (14) copies of its Application to Intervene in the above matter.

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

Sincerely,



William J. Niehoff  
Attorney

cc: Service List



BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

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Missouri Public  
Service Commission

In the Matter of 4 CSR 240-80.015 Proposed  
Rule – Steam Heating Utilities Affiliate  
Transactions

Case No. HX-99-44<sup>3</sup><sub>1</sub>

**APPLICATION OF AMEREN CORPORATION AND  
UNION ELECTRIC COMPANY TO INTERVENE**

COME NOW Ameren Corporation and Union Electric Company d/b/a AmerenUE (“AmerenUE”) (collectively referred to as “Ameren”), a Missouri corporation, and pursuant to 4 CSR 240-2.075, hereby applies to intervene in the above-captioned matter and to become parties herein. In support thereof, Ameren 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. 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. Ameren Corporation is a public utility holding company registered with the Securities and Exchange Commission under 15 U.S.C. §79 et seq. Ameren Corporation owns two public utilities, AmerenUE and Central Illinois Public Service Company which does business as AmerenCIPS (“AmerenCIPS”).

2. In this proposed rulemaking, the Commission is proposing to adopt rules governing affiliate transactions among steam heating utilities and their subsidiaries.

3. As a steam heating utility and owner of a steam heating utility subject to Commission jurisdiction, Ameren seeks intervention because any affiliate transaction rules

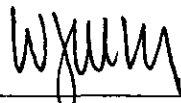
adopted by the Commission will directly affect the way in which AmerenUE conducts its business, and Ameren's interest is different from that of the general public and cannot be represented adequately by any other party to this proceeding.

4. Ameren opposes the adoption of the rules proposed governing affiliate transactions as set forth in its Comments submitted to this Commission. Ameren has proposed alternative rules that accomplish the goals identified and that are less costly and that increase consumer welfare.

WHEREFORE, for the foregoing reasons, Ameren Corporation and Union Electric Company respectfully request that the Commission grant this Application to Intervene and allow them to become parties to this proceeding with all rights attendant thereto.

Respectfully submitted,


AMEREN CORPORATION &  
UNION ELECTRIC COMPANY  
d/b/a AmerenUE

By \_\_\_\_\_  
Its Attorney

William J. Niehoff, MBE #36448  
Attorney  
Ameren Services Company  
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P.O. Box 66149 (MC 1310)  
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(314) 554-4014 (fax)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via first-class, U.S. mail, postage prepaid, to all parties of record on this 1<sup>ST</sup> day of July, 1999.

  
\_\_\_\_\_  
William J. Niehoff

**SERVICE LIST FOR  
CASE NO: HX-99-443**

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