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December 7, 2001

Mr. Dale Hardy Roberts
Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³
DEC 7 2001
Missouri Public
Service Commission

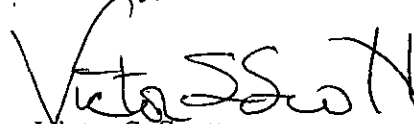
Re: PSC Case No. EO-2002-178

Dear Judge Roberts:

For filing in the above matter please find enclosed original and 8 copies of the Amended Verified Application of Employees of Gascosage Electric Cooperative to intervene in the above matter.

We have hand delivered or mailed a copy to all parties of record. Thank you for your attention.

Sincerely,


Victor S. Scott

VSS:om

cc: William Bobnar
Larry Merry
John Coffman
Robert Francen
Jan Bond

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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³
DEC 7 2001
Missouri Public
Service Commission

In the matter of the Joint Application of Union)
Electric Company and Gascosage Electric)
Cooperative for an order approving a change in)
electric supplier for certain Union Electric)
Company customers for reasons in the public)
interest; authorizing the sale, transfer, and)
assignment of certain electric distribution facilities,)
substations, and easements from Union Electric)
Company to Gascosage Electric Cooperative; and)
approving the First Amendment to the Existing)
Territorial Agreement between Union Electric)
Company and Gascosage Electric Cooperative)

Case No. EO-2002-178

AMENDED
VERIFIED APPLICATION OF THE EMPLOYEES OF
GASCOSAGE ELECTRIC COOPERATIVE
TO INTERVENE

Comes now the employees of Gascosage Electric Cooperative (hereinafter referred to as "Employees"), by and through their Carl Brandt as representative of the employees and counsel, Victor S. Scott and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application Employees state:

1. This matter involves an application submitted to this Commission by Union Electric Company, d/b/a AmerenUE ("Union Electric"), and Gascosage Electric Cooperative ("Gascosage") for approval to: (1) change the electric supplier for certain Union Electric customers in and around the Cities of Brumley and Ulman from Union Electric to Gascosage; (2) authorize the sale, transfer, and assignment of certain electric distribution facilities, easements and substations from Union Electric to Gascosage; and (3) amend an existing territorial agreement that was approved by the Public Service Commission by Report and Order in Case No. EO-98-279.

2. The employees of Gascosage Electric Cooperative are:.

Karl Brandt	Beverly Hueston
Deborah Alexander	Dwight Humphrey
Georgia Alexander	Donna Irvin
Wilford Alexander	Dawn Keeth
Ethel M. Allen	Shawn Lipscomb
Mike Allen	Tony Martin
James Clark	Travis Martin
Debbie Doyle	Wilbert Medlen
Kim Doyle	Billy Null
Robert Fox	Larry Prater
Aaron George	Janet Rigsby
Carmen Hartwell	Craig Rivera
Robert Hathaway	JR Scott
Travis Hauck	Robbie Yoakum
Brent Holtsclaw	Gayle Prater
Ray Howser	

The employees of Gascosage, will be directly affected by the proposed transaction.

3. Gascosage Electric Cooperative, is a rural electric cooperative, organized and existing under the laws of the State of Missouri, and is the employer of the Employees described herein. The employees are not organized and therefore do not have any evidence of registration.

4. The principal place of business of the Employees is Gascosage Electric Cooperative. Correspondence, orders and decisions of the Commission should be sent to:

Employees of Gascosage Electric Cooperative
c/o Gascosage Electric Cooperative
P. O. Drawer G
Dixon, MO 65459
573-659-7146
FAX 573-759-6020

Victor S. Scott
Andereck, Evans, Milne,
Peace & Johnson, L.L.C.
P. O. Box 1438
Jefferson City, MO 65102
573-659-7146
FAX 573-759-6020

5. Employees do not have any pending actions for final unsatisfied judgment or decisions against them as contemplated by 4 CSR 240-2.060(1)(K). Employees do not have to file any report with this Commission or have any assessment fees which are overdue.

6. Employees seek permission to intervene in this matter pursuant to 4 CSR240-2.075.

7. Employees of Gascosage Electric Cooperative have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the dependable delivery of electric service and related products and services at a reasonable cost, Employees are concerned with the impact the proposed transactions could have on jobs and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from this case.

8. Employees support the requested sale of facilities and transfer of customer from AmerenUE to Gascosage Electric Cooperative.

9. No other party in this proceeding can adequately represent the additional, legitimate concerns of the Employees of Gascosage Electric Cooperative.

10. Whereas, this Amended Application is being filed to clarify and to conform to the Commission's Rules pursuant to the direction give by Judge Dippell at the November 28th, 2001, Prehearing Conference.

WHEREFORE, the Employees of Gascosage Electric Cooperative respectfully asks the Commission to grant this application and to permit them to intervene herein.

ANDERECK, EVANS, MILNE
PEACE & JOHNSON, L.L.C.

By: Victor S. Scott
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E-Mail: vscott@aempb.com
ATTORNEYS FOR EMPLOYEES

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 7th day of December 2001.

Victor S. Scott

VERIFICATION

STATE OF MISSOURI)
) SS
COUNTY OF COLE)

On the 7th day of December, 2001, before me appeared Victor S. Scott, to me personally known, who being by me first duly sworn, states that he is the attorney for the Employees of Gascosage Electric Cooperative and is authorized to file this application to intervene with the Missouri Public Service Commission and to execute the Application and this Verification on behalf of the Employees of Gascosage Electric Cooperative, and acknowledged that he has read the Application to Intervene and that the facts stated therein are true and correct to the best of his knowledge, information and belief.


Victor S. Scott

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal on the date first written above.

ORNA MICKELIS
Notary Public - Notary Seal
STATE OF MISSOURI
Callaway County
My Commission Expires: Apr. 16, 2003


Notary Public

Mr. John Coffman
Office of Public Counsel
P. O. Box 7800
Jefferson City, MO 65102

Mr. William Bobnar
Ameren Services Company
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149

Ms. Jan Bond
Attorney at Law
7730 Carondelet Ave, Suite 200
St. Louis, MO 63105

Mr. Robert Francen
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Mr. Larry Merry
Union Electric Company
P. O. Box 1558
Jefferson City, MO 65102

VERIFICATION

STATE OF MISSOURI)
) SS
 COUNTY OF PULASKI)

On the 7 day of June, 2001, before me appeared the following individuals, as listed below. to me personally known, who being by me first duly sworn, states that he/she is an Employee of Gascoage Electric Cooperative and is authorized to execute this Verification, and each acknowledges that he/she has read the Application to Intervene and that the facts stated therein are true and correct to the best of his/her knowledge, information and belief.

<i>Wilford Alexander</i>	Wilford Alexander
<i>Debbie Alexander</i>	Debbie Alexander
<i>Georgia Alexander</i>	Georgia Alexander
<i>Mike Allen</i>	Mike Allen
<i>Ethel May Allen</i>	Ethel May Allen
<i>Karl Brandt</i>	Karl Brandt
<i>Jim Clark</i>	Jim Clark
<i>Debbie Doyle</i>	Debbie Doyle
<i>Kim Doyle</i>	Kim Doyle
<i>Bob Fox</i>	Bob Fox
<i>Carmen Hartwell</i>	Carmen Hartwell
<i>Robert D. Hathaway</i>	Robert Hathaway
<i>Travis Hauck</i>	Travis Hauck
<i>Brent Holtsclaw</i>	Brent Holtsclaw
<i>Ray Howser</i>	Ray Howser
<i>Beverly Hueston</i>	Beverly Hueston
<i>Dwight Humphrey</i>	Dwight Humphrey
<i>Donna Irvin</i>	Donna Irvin
<i>Shawn Lipscomb</i>	Shawn Lipscomb
<i>Tony L. Martin</i>	Tony Martin
<i>Travis Martin</i>	Travis Martin
<i>Bill Medlen</i>	Bill Medlen
<i>Billy Null</i>	Billy Null
<i>Larry Prater</i>	Larry Prater
<i>Janet Rigsby</i>	Janet Rigsby
<i>Craig Rivera</i>	Craig Rivera
<i>JR Scott</i>	JR Scott
<i>Gregory Yoakum</i>	Gregory Yoakum
<i>Gayle Prater</i>	Gayle Prater
<i>Aaron George</i>	Aaron George

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal on the date first written above.


Notary Public

ORNA MICKELIS
Notary Public, Notary Seal:
STATE OF MISSOURI
Callaway County
My Commission Expires: Apr. 16, 2003