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PROFESSIONAL CORPORATION

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1918-1988

May 3, 1999

FILED

MAY 3 1999

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

**Missouri Public
Service Commission**

Re: 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

Dear Mr. Roberts:

Enclosed for filing please find an original and fourteen (14) copies of a *Application to Intervene* to be filed with your office.

Copies have been sent to all parties of record. Thank you for your attention to this matter.

Sincerely,



Dallas M. Forrest

DMF:tas

Encl.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAY 3 1999

Missouri Public
Service Commission

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 Friendship Village of South County, Friendship Village of West County, Village North, Cardinal Ritter Institute, and Orchard House Partnership (hereinafter known as the Retirement Facilities Coalition) to hereby request an Order from the Missouri Public Service Commission (Commission) allowing intervention in this docket pursuant to 4 CSR 240-2.110.

In support of this Application the Retirement Facilities Coalition states as follows:

1. The Retirement Facilities Coalition is comprised of several retirement care facilities located in the service territory of Union Electric Company (UE), which must purchase all electric service from UE.

2. All communications and pleadings in this docket should be directed to Paul H. Gardner and Dallas M. Forrest, Goller, Gardner & Feather, P.C., 131 E. High Street, Jefferson City, Missouri 65101, telephone number 573/635-6181, fax 573/635-1155.

3. The Retirement Facilities Coalition is already a party to Missouri Public Service Commission Case No. EO-96-15. Case No. EO-96-15 is directly related to this docket in that the parties to case No. EO-96-15 have entered into a Stipulation and Agreement, which if approved by the Commission, will result in the distribution of any revenue reduction ordered in Case

No. EM-96-149 among Union Electric's Non-Residential Rate Classes in accordance with the provisions of the Stipulation and Agreement.

4. This direct connection between Case No. EO-96-15 and Case No. EM-96-149 was not apparent at the time that Case No. EM-96-149 was opened by the Commission.

5. As members of UE's Large General Service rate classification, and as parties to Case No. EO-96-15, the members of the Retirement Facilities Coalition are directly interested in the outcome of Case No. EM-96-149, and that interest is different than that of the general public.

6. The Retirement Facilities Coalition will not file testimony in this case, and will not seek any extensions or delays in the procedural schedule if allowed late intervention in this docket. No party will be prejudiced if the Commission grants this Application and allows the Retirement Facilities Coalition to intervene in Case No. EM-96-149.

WHEREFORE, the Retirement Facilities Coalition respectfully requests that the Commission enter an Order granting late intervention in Case No. EM-96-149.

Respectfully submitted,

GOLLER, GARDNER AND FEATHER
PROFESSIONAL CORPORATION

By 

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Dallas M. Forrest Mo. Bar #45905
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Attorneys for The Retirement Facilities
Coalition

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document filed in the above captioned case has been sent to all counsel of record to Case EM-96-149 by First Class Mail, postage pre-paid, U.S. Mail, or by hand delivering the same this 3rd day of May, 1999, to:


Dallas M. Forrest