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December 27, 2004

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, Missouri 65101

FILED³

DEC 27 2004

**Missouri Public
Service Commission**

Re: Case No. EA-2005-0180

Dear Mr. Roberts:

Attached for filing in the above-referenced case is the Application to Intervene of the Missouri Industrial Energy Consumers or "MIEC".

Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Diana Vuylsteke".

Diana M. Vuylsteke
DMV:rms

Enclosures (9)
cc: All Parties

Bryan Cave LLP

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*And Bryan Cave,
A Multinational Partnership,
London*

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

**Missouri Public
Service Commission**

In the Matter of the Application of Union Electric)
Company for a Certificate of Public Convenience)
and Necessity Authorizing it to Construct, Install,)
Own, Operate, Control, Manage and Maintain)
Electric Plant, as Defined in Section 386.020(14),)
RSMo, to Provide Electric Service in a Portion of)
New Madrid County, Missouri , as an Extension)
of its Existing Certificated Area.)

Case No. EA-2005-0180

**APPLICATION TO INTERVENE
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Anheuser-Busch Companies, Inc., The Boeing Company, DaimlerChrysler, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, J.W. Aluminum, Monsanto Company, Pfizer, Precoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application, the MIEC states as follows:

1. The MIEC is a group of large customers of Union Electric Company, doing business as AmerenUE ("AmerenUE"), and the rates, terms and conditions of the MIEC's electric service may be affected by the outcome of this case;
2. The MIEC's interest in this case is to ensure that AmerenUE provides electric service to the MIEC under reasonable terms and conditions at just and reasonable rates;
3. As a group of large customers of AmerenUE, the MIEC's interest in this proceeding is different than that of the general public;

4. The MIEC does not yet have sufficient information to take a position regarding AmerenUE's Application, but reserves the right to take positions on all issues that may affect its members in this case; and

5. Granting the MIEC's proposed intervention would serve the public interest by assisting in the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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ATTORNEY FOR THE MIEC

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have served on all parties by electronic service this 27th day of December, 2004.

Diana Vuylsteke
Diana M. Vuylsteke