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November 8, 2001

FILED<sup>2</sup>  
NOV 09 2001  
Missouri Public  
Service Commission

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison  
Post Office Box 360  
Jefferson City, Missouri 65102

**Re: *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)**

Dear Judge Roberts:

I am enclosing an original and ten copies of the Request For Leave To File Opposition Of Operating Engineers Local 148 To Joint Motion To Oppose Intervention With All Pages and Opposition Of Operating Engineers Local 148 To Joint Motion To Oppose Intervention (Complete) in the referenced matter. I would appreciate the Commission stamping a copy of each document as received and returning them to me in the enclosed stamped, self-addressed envelope.

Thank you for your cooperation in this matter.

Very truly yours,

  
JAN BOND

JB/jkl  
Enclosures

cc: John Coffman, Esq.  
Robert Francen, Esq.  
William B. Bobnar, Esq.  
Mr. Larry Merry  
Victor S. Scott, Esq.  
Mr. John W. Greenlee  
Mr. Leo W. Marler  
Mr. Clayton E. Jenkins  
Three Rivers Electric Cooperative  
Mr. O.L. Wallace  
Mr. Dan Gier

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

**FILED<sup>2</sup>**  
NOV 09 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

**REQUEST FOR LEAVE TO FILE OPPOSITION OF  
OPERATING ENGINEERS LOCAL 148 TO  
JOINT MOTION TO OPPOSE INTERVENTION  
WITH ALL PAGES**

Comes now Intervenor-Applicant International Union of Operating Engineers Local No. 148, AFL-CIO ("OE Local 148"), and respectfully requests leave to file the enclosed Opposition Of Operating Engineers Local 148 To Joint Motion To Oppose Intervention (the "Opposition") containing all pages. In support of this request, Local 148 states as follows:

1. OE Local 148 timely filed its Opposition with the Public Service Commission (the "Commission") on November 5, 2001. At the same time, Intervenor-Applicant International Brotherhood of Electrical Workers Local 1455, AFL-CIO ("IBEW Local 1455") also filed its Opposition of International Brotherhood of Electrical Workers Local 1455 To Joint Motion To Oppose Intervention (the "IBEW Opposition"). OE Local 148's Opposition and the IBEW Opposition were intended to be virtually identical.

2. On November 8, 2001, the undersigned discovered for the first time that due to a printing or copying error, the original and at least some of the copies of OE Local 148's Opposition were filed with the Commission without pages 6, 7, and 8. The undersigned does not know whether or not the copies of OE Local 148's Opposition served on other parties in the case contained pages 6, 7, and 8.

3. The IBEW Opposition contained pages 6, 7, and 8, including virtually all the argument contained on the missing pages 6, 7, and 8 from OE Local 148's Opposition.

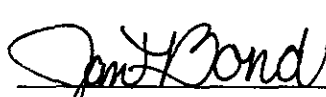
4. OE Local 148 seeks here to file its Opposition containing pages 6, 7, and 8. The enclosed document, styled "Opposition Of Engineers Local 148 To Joint Motion To Oppose Intervention (Complete)", contains the missing pages 6, 7, and 8.

5. Granting leave to file the complete Opposition at this time will not hinder or delay this proceeding or prejudice any party because: (a) the deadline to apply to intervene here is not until November 26, 2001, and (b) all parties had timely notice of the unions' complete argument from the IBEW Opposition.

6. Since the undersigned does not know whether the service copies of OE Local 148's Opposition contained pages 6, 7, and 8, copies of the enclosed complete document are being sent to all parties of record.

WHEREFORE, OE Local 148 respectfully requests leave to file the enclosed Opposition Of Operating Engineers Local 148 To Joint Motion To Oppose Intervention (Complete) with pages 6, 7, and 8.

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JAN BOND

Attorneys for International Union of  
Operating Engineers Local No. 148,  
AFL-CIO

**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was sent by  
overnight mail via Airbone Express to:

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Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
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Jefferson City, Missouri 65102

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and by United States mails, postage pre-paid to:

Leo W. Marler  
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1 Court Circle  
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Camdenton, Missouri 65020

Clayton E. Jenkins  
Clerk County Commission  
Miller County Courthouse  
P.O. Box 12  
Tuscumbia, Missouri 65082

Three Rivers Electric Cooperative  
P.O. Box 459  
Linn, Missouri 65051

O.L. Wallace  
Presiding Commissioner

1 Court Circle  
P.O. Box 960  
Camdenton, Missouri 65020

Dan Gier  
Presiding Commissioner  
Miller County Courthouse  
P.O. Box 12  
Tuscumbia, Missouri 65082

this 8th day of November, 2001.

  
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