

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

DEC 15 1995

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

The State of Missouri, at the relation of Jeremiah W. (Jay) Nixon, Attorney General of Missouri, submits this application to intervene pursuant o 4 CSR 240-2.110. In support of its application, the State of Missouri states:

1. Jeremiah W. (Jay) Nixon is the duly elected Attorney General of the State of Missouri and, as such, is authorized by law to appear and interplead on behalf of the State of Missouri in any proceeding in which the State's interest may be involved.

2. The State of Missouri and its constituent agencies, departments and institutions are a major customer of Union Electric Company and the procurement of services from Union Electric Company for the State of Missouri is made entirely of public funds, thereby necessitating state intervention.

3. Because the State and its constituent agencies are a major customer of Union

Electric it has a significant interest in this matter that differs from that of the general public which cannot be protected adequately by any other party to this proceeding. The State has a definite interest in knowing how the proposed transactions could possibly affect the daily operation of its various offices.

4. The state therefore, adequately satisfies the relevant standards for intervention within 4 CSR 240-2.110.

5. The granting of this application will in no way delay this proceeding, nor unduly expand its scope.

6. If this application to intervene is granted, the State of Missouri requests that a copy of each document filed by any party to this proceeding be mailed or delivered to Daryl R. Hylton, Assistant Attorney General, P.O. Box 899, Jefferson City, Missouri 55102.

WHEREFORE, the State of Missouri respectfully requests the Commission grant this application to intervene.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON
Attorney General



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid, this 15 December, 1995 to:

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