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December 1, 1999

Honorable Dale Hardy Roberts, Secretary/Chief Regulatory Law Judge
State of Missouri
Missouri Public Service Commission
Truman State Office Bldg. Rooms 530 & 840
Post Office Box 360
Jefferson City, Missouri 65102

EA-2000-308

FILED

DEC 2 1999

Missouri Public
Service Commission

Subject: Application to Intervene on behalf of Don Priest, Mary Ellen Erwin, Virginia Hays Priest, Marvin Konynenbelt, John E. Happel, Brooks R. Read, Diana L. Henry, Alva Branson, Tom Green, Barbara Crowley, Danny Winstead, Sharlyn Winstead, Nadine Jones, Calvin Jones, Deborah Volz, and Steven A. Volz, before the Public Service Commission, State of Missouri, in the Matter of the Application of the City of Rolla, Missouri, for an Order Assigning Exclusive Service Territories and for Determination of Fair and Reasonable Compensation Pursuant to Section 386.800, RSMo 1994.

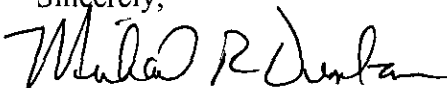
Dear Judge Roberts:

I have been retained to represent Don Priest, Mary Ellen Erwin, Virginia Hays Priest, Marvin Konynenbelt, John E. Happel, Brooks R. Read, Diana L. Henry, Alva Branson, Tom Green, Barbara Crowley, Danny Winstead, Sharlyn Winstead, Nadine Jones, Calvin Jones, Deborah Volz and Steven A. Volz, known as "Southside Neighbors."

I have attached for your consideration their Application to Intervene in this case. The subject matter of the pleading is their request to intervene and to be made a party of this case.

Thank you for your attention to this matter.

Sincerely,



Michael R. Dunbar

MRD: skg

cc: Gary W. Duffy, Esq.
Bryden, Swearingen & England
Post Office Box 456
Jefferson City, Missouri 65102-0456

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FILED
DEC 2 1999

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Application of the City of Rolla,)
Missouri, for an Order Assigning Exclusive)
Service Territories and for Determination)
of Fair and Reasonable Compensation)
Pursuant to Section 386.800, RSMo 1994.)

Case No. EA-2000-308

APPLICATION TO INTERVENE

COMES NOW, Don Priest, MaryEllen Irwin, Virginia Hays Priest, Marvin Konynenbelt, John E. Happel, Brooks R. Read, Diana L. Henry, Alva Branson, Tom Green, Barbara Crowley, Danny Winstead, Sharlyn Winstead, Nadine Jones, Calvin Jones, Deborah C. Volz and Steven A. Volz, whose names and addresses are also set out on the attached Appendix A, (who shall hereinafter be referred to for the sake of brevity and for convenience as the "Southside Neighbors") and pursuant to 4 CSR 240-2.075 respectfully state the following for their application to intervene:

1. On October 29, 1999, the city of Rolla, Missouri, filed an application with the Commission seeking an order pursuant to Section 386.800 RSMo 1994 assigning exclusive service territories and determining fair and reasonable compensation relating to a newly annexed tract of property where Intercounty Electric Cooperative Association (Intercounty) presently provides electric service.

2. Each of the "Southside Neighbors" identified on Appendix A are individuals and residents within the newly annexed area referred to by the City in its application, and all are present electric customers of Intercounty.

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Missouri Public
Service Commission

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3. All communications and pleadings in this docket should be directed to:

Michael R. Dunbar
Smith Dunbar Turley
Post Office Box 494
Waynesville, Missouri 65583
Telephone: 573/336-5222
Facsimile: 573/336-2282

4. The "Southside Neighbors" seek to appear in this proceeding because the Commission's decisions will directly affect the interests of each homeowner. Therefore, their interests are different from those of the general public. The appearance of the "Southside Neighbors" in this proceeding is in the public interest.

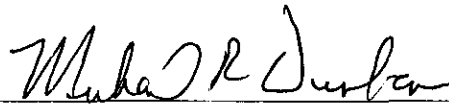
5. The "Southside Neighbors" respectfully request the Commission to issue an order allowing them to intervene in this proceeding.

Respectfully submitted,

SMITH DUNBAR TURLEY
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Attorneys For Intervenors

By:



Michael R. Dunbar

#37066

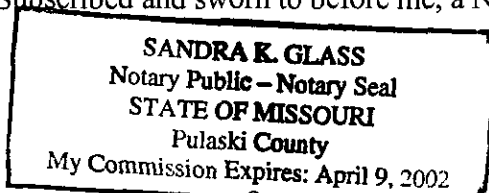
ATTORNEY VERIFICATION

STATE OF MISSOURI)
) SS.
COUNTY OF PULASKI)

I, Michael R. Dunbar, being first duly sworn, do hereby certify, depose and state that I am the attorney for "Southside Neighbors", Intervenors in the above captioned proceeding; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicants.

Michael R. Dunbar
Michael R. Dunbar #37066

Subscribed and sworn to before me, a Notary Public, this 2nd day of December, 1999.



Sandra K. Glass
Notary Public

My commission expires: April 9, 2002

CERTIFICATE OF SERVICE

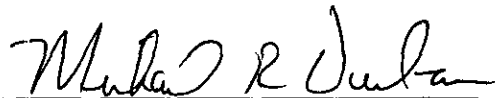
The undersigned certifies that a true and complete copy of the above and foregoing **Application to Intervene** was served by placing the same in an envelope, with first class postage affixed thereto, addressed as set forth below, and by then depositing the same in a U.S. Mail receptacle in Waynesville, Missouri, on the 2nd day of December, 1999.

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Missouri Public Service Commission
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By: 
Michael R. Dunbar #37066

APPENDIX A

Don Priest
1295 Highway O
Rolla, Missouri 65401
573/364-6528

Mary Ellen Erwin
1708 Forest Place
Rolla, Missouri 65401
573/364-8079

Marvin Konynenbelt
1708 Barnitz Avenue
Rolla, Missouri 65401
573/341-3006

John E. Happel
1854 Osage
Rolla, Missouri 65401
573/364-5089

Brooks R. Read
1713 Forest Drive
Rolla, Missouri 65401
573/364-8160

Diana L. Henry
1220 S. Rolla Street
Rolla, Missouri 65401
573/364-9344

Alva Branson
518 Keeton Road
Rolla, Missouri 65401
573/341-2057

Tom Green
1300 S. Bishop
Rolla, Missouri 65401
573/364-5495

Barbara Crowley
1841 Osage Drive
Rolla, Missouri 65401
573/364-6334

Danny Winstead
1299 Hwy O
Rolla, Missouri 65401
573/341-5927

Sharlyn Winstead
1299 Hwy O
Rolla, Missouri 65401
573/341-5927

Nadine Jones
538 Maplewood Drive
Rolla, Missouri 65401
573/364-5013

Calvin Jones
538 Maplewood Drive
Rolla, Missouri 65401
573/364-5013

Deborah C. Volz
1715 Barnitz Avenue
Rolla, Missouri 65401
573/341-3935

Steven A. Volz
1715 Barnitz Avenue
Rolla, Missouri 65401
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