

FILED

OCT 14 1997

MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
Union Electric Company for Approval)
of an Experimental Retail Wheeling)
Pilot.)

Case No. EO-98-95

APPLICATION TO INTERVENE

Comes now Williams Energy Services Company (WESCO), by Hendren and Andrae, Richard S. Brownlee, III, and for its Application to Intervene states:

1. The exact legal name of WESCO is Williams Energy Services Company. WESCO is a corporation existing under the laws of the State of Delaware and is duly authorized to do business in the State of Missouri. Williams principal place of business is Tulsa, Oklahoma.

2. All correspondence dealing with this matter should be directed to:

Richard S. Brownlee, III	Ms. Anne M. Denison
Hendren and Andrae, L.L.C.	Williams Energy Services Company
221 Bolivar Street	Post Office Box 2848
P.O. Box 1069	Tulsa, OK 74101-9567
Jefferson City, MO 65102	(918) 588-3886
(573) 636-8135	(918) 594-1717 (Facsimile)
(573) 636-5226 (Facsimile)	

3. WESCO is a subsidiary of the Williams Companies, Inc., a publicly-held company with operating subsidiaries engaged in various energy-related and telecommunications businesses. WESCO offers a full range of products and services to energy markets throughout North America. WESCO's core business includes natural gas, electricity and other commodity trading activities as well as energy-related price-risk management products and services. WESCO

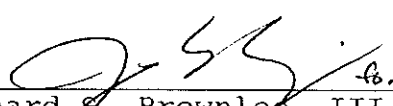
also provides financial services to participants in the energy industry.

4. On September 2, 1997, Union Electric Company (UE) filed an application with the Commission requesting approval of an experimental retail wheeling pilot. The pilot encompasses two market structures: a Power Exchange model whereby UE will shop for the best electric generation prices available on the open market and will pass any savings to the customer, and a Direct Access model whereby customers can select an alternative energy supplier from a list of qualified providers. All major classes of UE's Missouri retail electric customers, except street lighting customers, will participate in the pilot.

5. WESCO is a potential participant in the experimental retail wheeling pilot and, therefore, has a direct interest in this proceeding which is not similar to the public generally and which cannot be adequately represented by any other party to this proceeding.

WHEREFORE, WESCO respectfully requests the Commission grant it leave to intervene and participate fully in these proceedings.

HENDREN AND ANDRAE, L.L.C.


Richard S. Brownlee, III, #22422
221 Bolivar Street
P.O. Box 1069
Jefferson City, MO 65102
Attorneys for Intervenor
(573) 636-8135
(573) 636-5225 (Facsimile)

Certificate of Service

I hereby certify that a true copy of the foregoing was mailed on October 14, 1997, by prepaid United States mail to Office of Public Counsel, P.O. Box 7800, Jefferson City, MO 65102; Mr. William J. Niehoff, Attorney at Law, Union Electric Company, 1901 Chouteau Avenue, P.O. Box 66149, MC 1310, St. Louis, Missouri 63166-6149.



Richard S. Brownlee, III