

BRYAN CAVE LLP

WASHINGTON, D.C.
NEW YORK, NEW YORK
KANSAS CITY, MISSOURI
JEFFERSON CITY, MISSOURI
OVERLAND PARK, KANSAS
PHOENIX, ARIZONA
LOS ANGELES, CALIFORNIA
IRVINE, CALIFORNIA

ONE METROPOLITAN SQUARE
211 NORTH BROADWAY, SUITE 3600
ST. LOUIS, MISSOURI 63102-2750
(314) 259-2000
FACSIMILE: (314) 259-2020

RIYADH, SAUDI ARABIA
KUWAIT CITY, KUWAIT
ABU DHABI, UNITED ARAB EMIRATES
DUBAI, UNITED ARAB EMIRATES
HONG KONG
SHANGHAI, PEOPLE'S REPUBLIC OF CHINA
IN ASSOCIATION WITH BRYAN CAVE,
A MULTINATIONAL PARTNERSHIP.
LONDON, ENGLAND

DIANA M. VUYLSTEKE

DIRECT DIAL NUMBER
(314) 259-2543

INTERNET ADDRESS
DMVUYLSTEKE@BRYANCAVE.COM

July 9, 2001

FILED

JUL 10 2001

By Federal Express

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Missouri Public
Service Commission

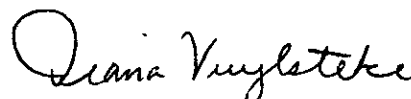
Re: Case No. E0-2001-684

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of the Application to Intervene of the Missouri Industrial Energy Consumers ("MIEC").

Thank you for your assistance in bringing this filing to the attention of the Commission

Very truly yours,



Diana M. Vuylsteke

DMV:dv
Enclosures
cc: All parties

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUL 10 2001

In the Matter of the Application of)
Union Electric Company (d/b/a)
AmerenUE) for an Order Authorizing)
it to withdraw from the Midwest ISO)
and to Participate in the Alliance RTO)

Missouri Public
Service Commission

Case No. EO-2001-684

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

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Holnam, Hussmann Refrigeration, ISP Minerals, Mallinckrodt, Inc., MEMC Electronic Materials, Monsanto Company, Precoat Metals, Procter & Gamble Manufacturing, Ralston 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 to Intervene, the MIEC states as follows:

1. The MIEC is a group of large customers of Union Electric Company d/b/a AmerenUE (hereafter "UE"), and the rates, terms and conditions of the MIEC's electric service could be affected by the outcome of this case;
2. As a group of large customers of UE, the MIEC's interest in this proceeding is different than that of the general public;
3. The MIEC does not yet have sufficient information to take a position regarding UE's filing, but reserves the right to take positions on all issues that may affect its members in this case.

4. 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

By *Diana Vuylsteke*

Diana M. Vuylsteke, #42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2543
Facsimile: (314) 259-2020
E-mail: dmvuylsteke@bryancave.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been hand-delivered to the Office of the General Counsel and the Office of the Public Counsel and will be mailed to counsel for Union Electric Company this 5th day of July, 2001.

Diana Vuylsteke