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December 20, 2000

FILED³
22 P/B
DEC 28 2000

Mr. Dale Roberts
Secretary and Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Missouri Public
Service Commission

Re: Joint Application of Missouri-American Water Company and St. Louis
County Water Company to Merge—Case No. WM-2001-309

Dear Mr. Roberts:

Enclosed for filing are the original and eight copies of the Application to Intervene on behalf of the Missouri Energy Group: Barnes-Jewish Hospital, DaimlerChrysler Corporation, Emerson Electric Company, SSM HealthCare, and Unity Health System in the above-referenced case.

An additional copy of the Application is enclosed, with the request it be file-stamped and returned to the undersigned.

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

Yours very truly,



Lisa C. Langeneckert

Enclosures (10)
cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
DEC 22^{PB} 2000

Missouri Public
Service Commission

In the Matter of the Joint Application of)
Missouri-American Water Company, St. Louis County)
Water Company d/b/a Missouri-American Water Company)
and Jefferson City Water Works Company d/b/a Missouri-)
American Water Company for Authority to Merge)
St. Louis County Water Company d/b/a Missouri-American)
Water Company and Jefferson City Water Works Company)
d/b/a Missouri American Water Company with and into)
Missouri-American Water Company and, in Connection)
therewith, Certain Other Related Transactions)

Case No. WM-2001-309

APPLICATION TO INTERVENE of M.E.G.

Come now applicants Barnes-Jewish Hospital, Emerson Electric Company, DaimlerChrysler Corporation, SSM Health Care and Unity Health System, collectively known as the Missouri Energy Group (M.E.G., but herein simply referred to as "Applicants"), by their attorneys pursuant to 4 C.S.R. 240-2.110 and move this Commission for leave to intervene in the above-styled proceeding. In support of this Application, and as grounds therefore, Applicants state as follows:

1. Applicants herein own and operate large industrial plants and hospitals within the state of Missouri. Applicants are now and for a number of years past have been substantial users of water supplied by St. Louis County Water Company ("Company").

2. This case was docketed in response to a joint application filed by Missouri-American Water Company, St. Louis County Water Company and Jefferson County Water Works Company requesting approval of merger and certain other related transactions of these three regulated public utilities.

STLD01-838523-1

3. The findings and determination of the Commission in this proceeding could substantially impact the cost and terms of water service to these Applicants. Accordingly, Applicants have a direct interest in the matters being considered in this proceeding which is different than that of the general public. It will aid the Commission and protect the public interest if Applicants are permitted to intervene in these proceedings so as to protect its interests and the interests of others so similarly situated.

4. It is Applicants' position that the interests of large or substantial users of St. Louis County Water Company d/b/a Missouri-American Water Company should not be adversely affected by the proposed transaction. Applicants cannot assert a position on specific matters until they have had an adequate opportunity to examine the record, testimony, and exhibits of other parties filed and to be filed herein.

WHEREFORE, having stated their grounds for intervention and the position and interests of Applicants in this proceeding, Applicants ask that the Commission:

(a) grant Applicants leave to intervene in this proceeding on their behalf and on behalf of others similarly situated, and to be heard at such time as the Commission may fix;

(b) entitle Applicants to have notice and to appear at the taking of testimony, to produce and cross examine witnesses, to be heard in person or by counsel on the argument, and in all other respects to be made parties on their own behalf and on behalf of customers similarly situated to these proceedings.

DATED at St. Louis, Missouri this 20th day of December, 2000.

Langeneckert

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Attorneys for Applicants

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a copy of the foregoing Application to Intervene was served upon parties of record by United States Mail this 20th day of December, 2000.

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
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