

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

OCT 19 2001

In the matter of the Joint Application of Union)
Electric Company and Gascosage Electric)
Cooperative for an order approving a change in)
electric supplier for certain Union Electric)
Company customers for reasons in the public)
interest; authorizing the sale, transfer, and)
assignment of certain electric distribution facilities,)
substations, and easements from Union Electric)
Company to Gascosage Electric Cooperative; and)
approving the First Amendment to the Existing)
Territorial Agreement between Union Electric)
Company and Gascosage Electric Cooperative)

Missouri Public
Service Commission

Case No. EO-2002-178

**VERIFIED APPLICATION OF INTERNATIONAL UNION OF
OPERATING ENGINEERS, LOCAL NO. 148, AFL-CIO, TO INTERVENE**

COMES NOW International Union of Operating Engineers, Local No. 148, AFL-CIO ("OE Local 148"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, OE Local 148 states:

1. This matter involves an Application submitted to this Commission by Union Electric Company, d/b/a AmerenUE, ("Union Electric") and Gascosage Electric Cooperative ("Gascosage") for approval to: (1) change the electric supplier for certain Union Electric customers in and around the Cities of Brumley and Ulman from Union Electric to Gascosage; (2) authorize the sale, transfer, and assignment of certain electric distribution facilities, easements, and substations from Union Electric to Gascosage; and (3) amend an existing territorial agreement that was approved by the Public Service Commission by Report and Order in Case No. EO-98-279.

2. OE Local 148 is a labor organization that represents for purposes of collective bargaining approximately 1000 of Union Electric's employees in "physical" classifications, both in-plant and outside, including employees who may be directly affected by the proposed transaction.

3. Although OE Local 148 is, technically, an unincorporated association, labor unions are not required to register their names as fictitious names with the Missouri Secretary of State. Thus, OE Local 148 does not have evidence of any such registration.

4. The principal place of business for OE Local 148 is located at 148 Wilma, Maryville, Illinois 62062. The telephone number for OE Local 148 is (618) 271-1807, and its fax number is (618) 345-0035. OE Local 148's primary electronic mail address is dgiljum@oe148.com.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Jan Bond
Attorney at Law
Diekemper, Hammond, Shinnars,
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7730 Carondelet, Suite 200
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(314) 727-6804 (Fax)
janbond@dhstl.com (E-mail)

6. OE Local 148 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. OE Local 148 does not have any annual reports or assessment fees that are overdue.

8. OE Local 148 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representative of certain of Union Electric's non-managerial, non-professional employees, OE Local 148 and the employees it represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the dependable delivery of electricity and related products and services at a reasonable cost, OE Local 148 and the employees it represents are additionally concerned with the impact the proposed transactions could have on jobs and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

10. OE Local 148 does not have sufficient information about the proposed transactions to take a position at this time and thus is unsure of the position it will take in this proceeding.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of OE Local 148 and the employees it represents here.

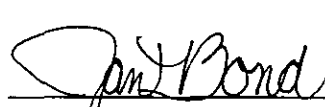
WHEREFORE, International Union of Operating Engineers, Local No. 148, AFL-CIO, respectfully asks the Commission to grant this application and to permit OE Local 148 to intervene here.



JAN BOND, MBN 29227
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VERIFICATION

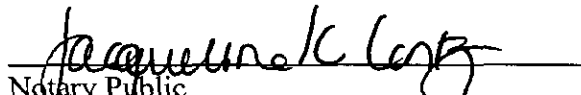
COMES NOW Jan Bond and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Bond further states that she has been authorized to sign and file this application on behalf of International Union of Operating Engineers, Local No. 148, AFL-CIO.



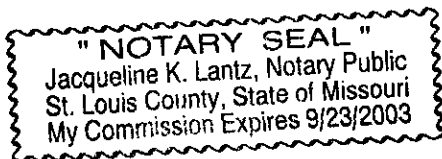
JAN BOND

Subscribed and sworn to before me this 18th day of October, 2001.

My Commission Expires:



Notary Public



Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, postage pre-paid to:

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Mr. John W. Greenlee
General Manager
Gascosage Electric Cooperative
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this 18th day of October, 2001.

