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November 21, 2001

FILED³

NOV 26 2001

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

Missouri Public
Service Commission

Re: PSC Case No. EO-¹⁰⁰²~~2000~~-178

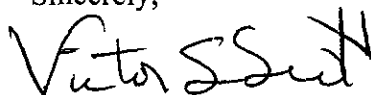
Dear Judge Roberts:

Enclosed for filing in the above matter please find original and 8 copies of Application to Intervene by Carl Brandt as representative of the Employees of Gascosage Electric Cooperative.

Pursuant to the Commission's order I have not served copies of this Application upon any of the parties.

Thank you for your attention.

Sincerely,



Victor S. Scott

VSS:om

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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³

NOV 26 2001

Missouri Public
Service Commission

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)

Case No. EO-2002-178

**VERIFIED APPLICATION OF CARL BRANDT AS REPRESENTATIVE
OF EMPLOYEES OF GASCOSAGE ELECTRIC COOPERATIVE
TO INTERVENE**

Comes now Carl Brandt as representative of the employees of Gascosage Electric Cooperative (hereinafter referred to as "Employees"), by and through their 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 Employees state:

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.

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2. Carl Brandt is representative of the employees of Gascosage Electric Cooperative. The employees of Gascosage, will be directly affected by the proposed transaction.

3. Gascosage Electric Cooperative, is a rural electric cooperative, organized and existing under the laws of the State of Missouri, and is the employer of the Employees described herein. The employees are not organized and therefore do not have any evidence of registration.

4. The principal place of business of the Employees is Gascosage Electric Cooperative. Correspondence, orders and decisions of the Commission should be sent to:

Carl Brandt
c/o Gascosage Electric Cooperative
P. O. Drawer G
Dixon, MO 65459
573-659-7146
FAX 573-759-6020

Victor S. Scott
Andereck, Evans, Milne,
Peace & Johnson, L.L.C.
P. O. Box 1438
Jefferson City, MO 65102
573-659-7146
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5. Employees do not have any pending actions for final unsatisfied judgment or decisions against them as contemplated by 4 CSR 240-2.060(1)(K). Employees do not have to file any report with this Commission or have any assessment fees which are overdue.

6. Employees seek permission to intervene in this matter pursuant to 4 CSR240-2.075.

7. Employees of Gascosage Electric Cooperative 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 electric service and related products and services at a reasonable cost, Employees are 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 this case.

8. Employees do not at this time have sufficient information concerning this proceeding and is thus unsure of what position they will take in this proceeding.

9. No other party in this proceeding can adequately represent the additional, legitimate concerns of the Employees of Gascoage Electric Cooperative.

WHEREFORE, Carl Brandt as representative of the Employees of Gascoage Electric Cooperative respectfully asks the Commission to grant this application and to permit them to intervene herein.

ANDERECK, EVANS, MILNE
PEACE & JOHNSON, L.L.C.

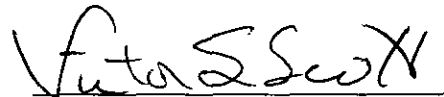
By: Victor S. Scott
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ATTORNEYS FOR EMPLOYEES

VERIFICATION


STATE OF MISSOURI)
) SS
COUNTY OF COLE)

On the 21 day of Nov, 2001, before me appeared Victor S. Scott, to me personally known, who being by me first duly sworn, states that he is the attorney for Carl Brandt as representative of the Employees of Gascosage Electric Cooperative and is authorized to file this application to intervene with the Missouri Public Service Commission and to execute the Application and this Verification on behalf of Carl Brandt as representative of the employees of Gascosage Electric Cooperative, and acknowledged that he has read the Application to Intervene and that the facts stated therein are true and correct to the best of his knowledge, information and belief.


Victor S. Scott

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal on the date first written above.

ORNA MICKELIS
Notary Public - Notary Seal
STATE OF MISSOURI
Callaway County
My Commission Expires: Apr. 16, 2003


Notary Public