

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Gascosage Electric)
Cooperative and Three Rivers Electric Cooperative)
for Approval of a Written Territorial Agreement)
Designating the Boundaries of Each Electric Service)
Supplier within Camden, Cole, Franklin, Gasconade,)
Maries, Miller, Moniteau, Osage, Phelps, and Pulaski)
Counties, Missouri.)

Case No. EO-2004-0217

VERIFIED APPLICATION TO INTERVENE

COMES NOW, Union Electric Company d/b/a AmerenUE (“Company”), a Missouri corporation, and respectfully applies to the Missouri Public Service Commission (the “Commission”) for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, Company states as follows:

1. Company is a corporation organized and existing under the laws of the State of Missouri, in good standing in all respects, with its principal office and place of business located at One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. Company is an electrical corporation subject to the jurisdiction of the Commission and engaged in the sale and distribution of electricity in portions of Missouri, including many of the counties cited in the application for this proceeding.

2. Correspondence, communications, orders and decisions in regard to this application should be directed to:

Mr. William B. Bobnar
Associate General Counsel
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-3148
(314) 554-4014 (fax)

Mr. Larry Merry
District Manager
Union Electric Company
P.O. Box 1558
Jefferson City, MO 65102-1558

3. Case No. EO-2004-0217 involves an application submitted to the Commission by Gascosage Electric Cooperative and Three Rivers Electric Cooperative for approval of a written territorial agreement designating the boundaries of each supplier within Camden, Cole, Franklin, Gasconade, Maries, Miller, Moniteau, Osage, Phelps, and Pulaski Counties, Missouri.

4. Company has an interest in this case different from the general public. Company is engaged in the sale and distribution of electricity in portions of Missouri, including many of the counties cited in the application for this proceeding. Section 5.1 of the Territorial Agreement between Gascosage Electric Cooperative and Three Rivers Electric Cooperative (the "Territorial Agreement") contains a right of first refusal, which can impact Company's ability to enter into customer exchanges with both electric suppliers in the future. Company seeks intervention in this proceeding in order to protect its interests, interests that could be adversely impacted by a final order arising from the case

5. Company does not have sufficient information about the proposed amendment to take a position at the time and is thus unsure of the position it will take in this proceeding.

6. Company has no final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates, which judgments or decisions have occurred within three (3) years of the date of this application. By the nature of its business, Company has, from time-to-time, pending actions in state and federal agencies and courts involving customer service or rates. Company has no annual report or assessment fees that are overdue to this Commission.

WHEREFORE, Company respectfully request that the Commission grant this application and permit Company to intervene in this proceeding.

Respectfully submitted,

AMEREN SERVICES COMPANY

By: William B. Bobnar

William B. Bobnar

MBEN 38966

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ATTORNEY FOR UNION
ELECTRIC COMPANY
d/b/a AmerenUE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served on all Parties of Record, via first-class U.S. Mail, postage prepaid, on this 4th day of December, 2003.

John Coffman
Office of the Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Jim Ketter
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Victor Scott
Lisa Cole Chase
Andereck, Evans, Milne, Peace & Johnson, L.L.C.
700 E. Capitol Ave.
P.O. Box 1438
Jefferson City, Missouri 65102-1438

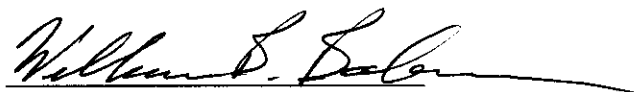
General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, Missouri 65101



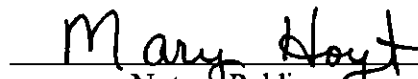
VERIFICATION

STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

On this 4th day of December, 2002, I, William B. Bobnar, a licensed attorney in good standing employed by Ameren Services Company, being first duly sworn upon my oath, state that I have read the foregoing *Verified Application to Intervene* of Union Electric Company d/b/a AmerenUE, that the facts stated therein are true and correct to the best of my knowledge, information and belief and that the above attorney is authorized to file such document on behalf of Union Electric Company d/b/a AmerenUE.


William B. Bobnar

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


Notary Public

