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April 30, 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street
Suite 100
P.O. Box 360
Jefferson City, MO 65102-0360

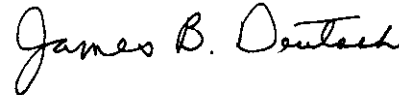
RE: Case No. EO-2002-351
Ameren UE

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of an Application for Intervention on behalf of Concerned Citizens of Family Farms and Heritage and Douglas McDaniel, Chairperson.

Copies of this filing have on this date been mailed to counsel of record. Thank you for your attention to this matter.

Sincerely,



James B. Deutsch

JBD:krw

Enclosure

cc: John Coffman
Bruce H. Bates
Joseph H. Raybuck

(KW5492.WPD;1)

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

Application of Union Electric Company)	
for Permission and Authority to Construct,)	
Operate, Own and Maintain a 345 kilovolt)	Case No. EO-2002-351
Transmission Line in Maries, Osage and)	
Pulaski Counties, Missouri)	
("Callaway-Franks Line"))	

APPLICATION FOR INTERVENTION

COMES NOW Concerned Citizens of Family Farms and Heritage and Douglas McDaniel, Intervenor, by and through counsel, in accordance with 4 CSR 240-2.075, and applies to intervene and become a party in the above-referenced case and, in support of this Application for Intervention, respectfully states as follows:

1. Intervenor Concerned Citizens of Family Farms and Heritage ("Concerned Citizens") is an unincorporated non-profit association of land owners in Osage, Maries and Pulaski County who support family farms and are concerned with commercial development of farm land and other activities which adversely impact upon the family farm. The current membership of Concerned Citizens is set forth in Attachment A.

2. Intervenor, Douglas McDaniel, is an individual citizen, taxpayer and owner of certain real property in Osage County, Route 2, Box 89, Linn, Missouri. Mr. McDaniel is also Chairperson of Concerned Citizens.

3. The Application for certificate of convenience and necessity in this matter was filed January 18, 2002. By Order dated February 8, 2002, and effective February 18, 2002, the Commission gave notice to various specific parties of the Application and set a deadline for intervention of February 18, 2002. Intervenor did not receive any notice of the Application and

were not listed in the Order as persons who were intended by the Commission to receive direct notice of the Application.

4. By Order issued March 8, 2002, and effective March 18, 2002, this Commission indicated that no requests for intervention had been received during the 10 day intervention period; that a request for a public hearing had been received from the Osage County Commission; that any objection to the Application or request for hearing should be filed by April 15, 2002; and ordered that the PSC Staff file its recommendation on the Application no later than April 15, 2002.

5. A public hearing was scheduled and held on or about April 22, 2002, as requested by the Osage County Commission, which is how and where these Intervenor learned of the Application and first determined its likely adverse impact on them. By Order of April 22, 2002, effective April 29, 2002, this Commission granted PSC Staff's request for an extension of time to file its recommendation, in order to allow consideration of public comment from the April 22, 2002 public meeting.

6. On information and belief, the transcript of the April 22, 2002, public meeting is not yet prepared and available for review. Additionally, on information and belief, Staff has just presented the Commission with its conditional recommendation on April 29, 2002. Further, on information and belief, the Office of Public Counsel has not yet presented its position on this matter to the Commission, and further extension of the procedural schedule in this case may be requested in order for parties to prepare their positions and recommendations to the Commission.

7. Intervenor have diligently taken action to intervene in this case once becoming aware of it on or about April 22, 2002, and their failure to intervene within the 10 day period earlier provided by the Commission was not due to any fault or neglect on their part. Intervenor therefore

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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Attorneys for Intervenors

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the above and foregoing document were sent U.S. Mail, postage prepaid, to the following parties of record on this ~~30~~³⁰ day of April, 2002:

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