

FILED²

FEB 20 2003

LAW OFFICE OF ROBERT C. JOHNSON

720 OLIVE STREET SUITE 2400 ST. LOUIS, MO 63101
FAX: (314) 588-0638

Robert C. Johnson
DIRECT: (314) 345-6436
E-MAIL: bjohnson@blackwellsanders.com

**Missouri Public
Service Commission**
Lisa C. Langeneckert

DIRECT: (314) 345-6441
E-MAIL: llangeneckert@blackwellsanders.com

February 12, 2002

Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, MO 65102

EO-2003-0271

Re: U.E. Application to Participate in MISO through GridAmerica

Dear Mr. Roberts:

On behalf of the Missouri Energy Group, I enclose herewith for filing in the above matter, an original and eight (8) copies of its Application for Intervention in the above-referenced case. An additional copy of this document is enclosed, which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Yours very truly,



Lisa C. Langeneckert

Enclosures (11)
cc/enc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Missouri Public
Service Commission

Application of Union Electric Company)
For Authority to participate in the Midwest)
ISO through a contractual relationship)
With GridAmerica)

Case No. EO-2003-0271

APPLICATION TO INTERVENE OF THE
MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Continental Cement Co., Emerson Electric Company, Lone Star Industries Inc., River Cement Company, SSM HealthCare, and St. John's Mercy Health Care (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully states as follows:

1. Applicants own and operate not-for-profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of electricity from Union Electric Company (d/b/a AmerenUE and hereinafter "AmerenUE") and other utility companies in the state of Missouri.

2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct significant impact on Applicants' cost of energy service and the manner in which it is supplied. Therefore, granting this proposed intervention to the Applicants would serve the public interest.

3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. As large-use customers of AmerenUE, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general

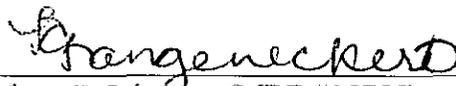
public. While Applicants cannot assert a position on specific matters because they have insufficient information, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, testimony and exhibits of other parties filed and to be filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Robert C. Johnson, Esq.
Lisa C. Langeneckert, Esq.
Law Office of Robert C. Johnson
720 Olive Street, Suite 2400
St. Louis, MO 63101
(314) 345-6441

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants to have notice and to appear at the taking of testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,



Robert C. Johnson (MBE #15755)
Lisa C. Langeneckert (MBE #49781)
720 Olive Street, 24th Floor
St. Louis, MO 63101
(314) 588-0638 (fax)
(314) 345-6436 (Robert C. Johnson phone)
(314) 345-6441 (Lisa C. Langeneckert phone)
bjohnson@blackwellsanders.com
llangeneckert@blackwellsanders.com

Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on:

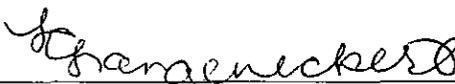
Dated at St. Louis, Missouri this 12th day of February, 2003:

Office of Public Counsel
650 Governor Office Building
200 Madison Street
P.O. Box 7800
Jefferson City, MO 65102

David B. Hennen, Esq.
Joseph H. Raybuck, Esq.
Ameren Services Company
1901 Chouteau Avenue
P.O. Box 66149
St. Louis, MO 63166-6149

James B. Lowery, Esq.
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102



Lisa C. Langeneckert