



Diana M. Vuylsteke
Voice: 259-2543
dmvuylsteke@bryancave.com

September 17, 2003

BY HAND DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
St. Louis, Missouri 65101

Re: Case No. EO-2004-0108

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copies each of the Missouri Industrial Energy Consumers' Application to Intervene.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Diana M. Vuylsteke

DMV:rms
Enclosures

FILED⁵

SEP 17 2003

**Missouri Public
Service Commission**

Bryan Cave LLP

Riverview Office Center
221 Bolivar Street
Jefferson City, MO 65101-1574
Tel (573) 556-6620
Fax (573) 556-6630
www.bryancave.com

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

FILED

SEP 17 2003

Missouri Public
Service Commission

In the Matter of the Application of)
Union Electric Company, doing business)
As AmerenUE, for an Order Authorizing)
The Sale, Transfer and Assignment of)
Certain Assets, Real Estate, Leased)
Property, Easements and Contractual)
Agreements to Central Illinois Public)
Service Company, doing business as)
AmerenCIPS, and, in connection therewith,)
Certain Other Related Transactions.)

Case No. EO-2004-0108

**APPLICATION TO INTERVENE
OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, ISP Minerals, Monsanto Company, Pfizer, Precoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

1. The MIEC is a group of large customers of Union Electric Company d/b/a AmerenUE (hereafter "UE"), and the rates, terms and conditions of the MIEC's electric service may be affected by the outcome of this case;
2. The MIEC's interest in this case is to ensure that UE provides electric service to the MIEC under reasonable terms and conditions at just and reasonable rates;
3. As a group of large customers of UE, the MIEC's interest in this proceeding is different than that of the general public;

4. The MIEC does not yet have sufficient information to take a position regarding AmerenUE's Application, but reserves the right to take positions on all issues that may affect its members in this case.
5. Granting the MIEC's proposed intervention would serve the public interest by assisting in the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: Diana M. Vuylsteke
Diana M. Vuylsteke, #42419
211 N. Broadway, Suite 3600
St. Louis, Missouri 63102
Telephone: (314) 259-2543
Facsimile: (314) 259-2020
E-mail: dmvuylsteke@bryancave.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have mailed by first class United States Mail, postage prepaid, to all persons required by the Commission to be served, this 17th day of September, 2003.

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