

FILED

JAN 06 2005

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of the Application of Union )  
Electric Company for a Certificate of ) **Case No. EA-2005-0180**  
Public Convenience and Necessity )  
Authorizing it to Construct, Install, Own, )  
Operate, Control, Manage and Maintain )  
Electric Plant, as Defined in Section )  
386.020(14), RSMo, to Provide Electric )  
Service in a Portion of New Madrid County )  
Missouri, as an Extension of Its Existing )  
Certificated Area )

**MOTION FOR INTERVENTION**

COMES NOW the Missouri Joint Municipal Electric Utility Commission (MJMEUC) and, in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application for Intervention, respectfully states as follows:

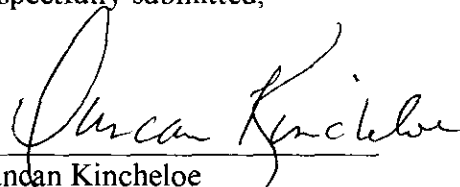
1. The MJMEUC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers for the benefit of the inhabitants of municipalities jointly contracting to establish the MJMEUC. Fifty-seven Missouri municipalities are current parties to the joint contract establishing the MJMEUC.
2. Various municipal utility members of the MJMEUC are wholesale energy customers of Union Electric Company, d/b/a AmerenUE, and are dependent on transmission service provided over facilities owned by Union Electric Company, and may be affected by a final order in this matter. The interests of the MJMEUC and its members are different from those of the general public and cannot be adequately represented by any other party. As a joint municipal utility commission with distinctive interests in this case, the public interest would be served by its proposed intervention.

3. At this stage, the MJMEUC is uncertain of the position it will take on the various issues that may arise in the instant proceeding, is respectful of the needs and objectives of Noranda Aluminum, Inc., and is especially interested in UE's perspective on the public interest with regard to the prospective transaction's impact on electric transmission. Having taken an active interest in the enactment of 91.026 RSMo. in its current form, and noting that Subsection 3 of 91.026 addresses the jurisdiction of the Commission only with regard to determination of rates, the MJMEUC would look forward to an opportunity to submit a very brief memorandum of law by January 18, as the Commission has required of the parties.
4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

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Columbia, MO 65203  
(573) 445-3279  
(573) 445-0680 (fax)

WHEREFORE, having stated its grounds for intervention, the MJMEUC requests the Commission to enter its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

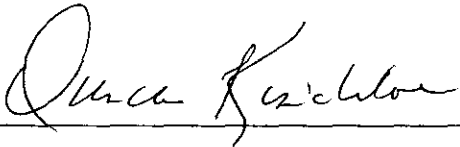
Respectfully submitted,



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ATTORNEY FOR MISSOURI JOINT  
MUNICIPAL ELECTRIC UTILITY  
COMMISSION

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was delivered by first class mail to Joseph H. Raybuck and Edward C. Fitzhenry, Ameren Services Company; James B. Lowery, Smith Lewis; Stuart W. Conrad, Finnegan, Conrad & Peterson, L.C.; and the Office of the Public Counsel on this 6th day of January, 2005.

  
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