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September 12, 2003

**FILED<sup>4</sup>**

**SEP 15 2003**

**Missouri Public  
Service Commission**

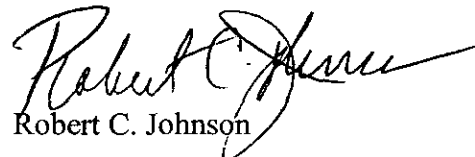
Dale Hardy Roberts, Secretary  
Missouri Public Service Commission  
Governor Office Building  
P.O. Box 360  
Jefferson City, MO 65102

Re: AmerenUE/AmerenCIPS Sale and Transfer of Illinois Assets  
MoPSC Case No. EO-2004-0108

Dear Sir:

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,

  
Robert C. Johnson

RCJ/gmw  
Enclosures (3)  
cc/enc: Ameren Services Company  
Office of the Public Counsel

SEP 15 2003

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

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 Co., )  
 (d/b/a AmerenCIPS) and, in connection therewith, )  
 certain other related transactions )

Missouri Public  
Service Commission

Case No.: EO-2004-0108

**APPLICATION TO INTERVENE OF  
THE MISSOURI ENERGY GROUP**

Pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, Emerson Electric Company, Holcim, Inc., 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 state as follows:

1. Applicants are an ad hoc group of not-for-profit hospital systems and large industrial plants within the state of Missouri that for many years have purchased substantial amounts of electricity from AmerenUE and other utility companies in the state of Missouri and have actively participated in previous cases involving AmerenUE (here in after referred to as "UE") before this Commission;

2. As large users, the rates and terms and conditions of the electric service of Applicants now or in the future may be affected by the outcome of this docket. Applicants have an interest in avoiding any adverse impact on the rates and terms and conditions of their electric service and cannot be adequately represented by any other party;

4. It is the position of Applicants that their rates and service should not be adversely affected by the transactions proposed by AmerenUE as described in its Application herein. Applicants do not yet have sufficient information to take a position regarding issues that may arise herein but reserve the right to take positions on all issues that may arise herein and may adversely affect its members in this case;

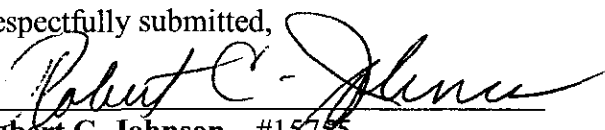
5. Granting intervention by Applicants in this case will serve the public interest by assisting the Commission in development of a more complete record for its decision; and

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

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Lisa C. Langeneckert, Esq.  
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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 participate in discovery matters, 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** #15755

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**Attorneys for Missouri Energy Group**

CERTIFICATE OF SERVICE

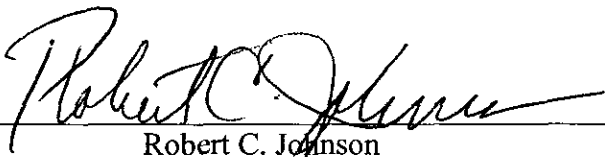
Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. EO-2004-0108

Dated at St. Louis, Missouri this 12<sup>th</sup> day of September, 2003:

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