

STEWART & KEEVIL, L.L.C.
ATTORNEYS AT LAW

CHARLES BRENT STEWART
JEFFREY A. KEEVIL

1001 CHERRY STREET
SUITE 302
COLUMBIA, MISSOURI 65201-7931

ORIGINAL

TELEPHONE (573) 499-0635
FACSIMILE (573) 499-0638

February 24, 2003

FILED³

FEB 24 2003

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

**Missouri Public
Service Commission**

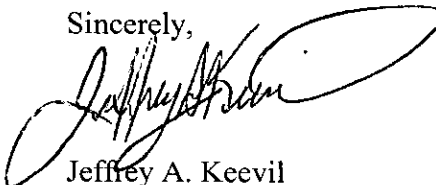
RE: Case No. EO-2003-0271

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case is an original and the appropriate number of copies of an APPLICATION TO INTERVENE on behalf of National Grid USA.

Copies of this filing have on this date been mailed or hand-delivered to counsel as provided in the Commission's February 14, 2003, order in the above-referenced case and to the Commission's General Counsel's Office. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er
Enclosures

FEB 24 2003

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

Missouri Public
Service Commission

In re: 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 NATIONAL GRID

COMES NOW National Grid USA ("National Grid"), pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and the Commission's order herein issued February 14, 2003, and hereby applies for leave to intervene and become a party in the above-referenced proceeding in support of the application of Union Electric Company d/b/a Ameren UE for authority to participate in the Midwest Independent System Operator ("MISO") through a contractual relationship with GridAmerica LLC. In support of this Application, National Grid respectfully states as follows:

1. National Grid, a registered public utility holding company under PUHCA, has been appointed to serve as the independent Managing Member of GridAmerica LLC, and Union Electric Company is one of the three current companies participating in GridAmerica LLC under the MISO. The Federal Energy Regulatory Commission recently approved the choice of National Grid to serve as Managing Member of the GridAmerica, LLC.¹

2. Because the outcome of this proceeding will have a significant effect on National Grid's business operations in the Midwest, National Grid has a direct and substantial interest in the matters to be considered in this case which is different from that of the general public and

¹ *Ameren Services Co.*, 101 FERC ¶ 61,320 (2002).

which may be adversely affected by the Commission decision in this proceeding, and which cannot be adequately represented by any other party.

3. The matters to be considered in this proceeding will directly impact National Grid's further development of GridAmerica LLC and integration of its focus on transmission efficiencies and associated transactions under the MISO. Therefore, granting this proposed intervention to National Grid would serve the public interest by allowing the input of the Managing Member of the GridAmerica LLC to be brought before the Commission.

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to the undersigned counsel, with copies to the following:

Gregory A. Hale, Esq.
Assistant General Counsel
Joel deJesus, Esq.
Counsel
National Grid USA Service Co., Inc.
25 Research Drive
Westborough, MA 01582
(508) 389-3187 (Mr. Hale's phone)
(508) 389-3057 (Mr. deJesus's phone)
(508) 389-2463(fax)
gregory.hale@us.ngrid.com
joel.dejesus@us.ngrid.com

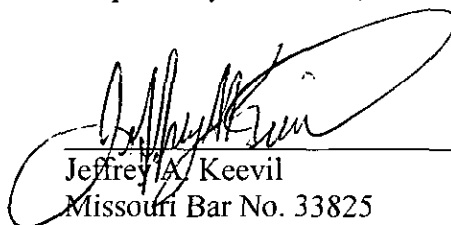
Susan L. Hodgson
Manager, Regional Tariff Development
National Grid USA Service Co., Inc.
300 Erie Boulevard West
Syracuse, NY 13202
(315) 428-5048
Sue.Hodgson@us.ngrid.com

Paul J. Halas, Esq.
Senior Vice President and General Counsel
GridAmerica LLC
Key Tower
50th Floor – Suite 5000
127 Public Square
Cleveland, OH 44114
(216) 771- 6720 (phone until 2/26/03)
(216) 776-1900 (phone as of 2/27/03)
(216) 776-1599 (fax as of 2/27/03)
paul.halas@us.ngrid.com

5. National Grid respectfully urges this Commission to approve the application of Union Electric Company to participate in GridAmerica LLC. The operational efficiencies and infrastructure improvements that GridAmerica LLC intends to bring to bear in the Midwest transmission system will inure to the benefit of all consumers within the GridAmerica LLC footprint. Accordingly, Union Electric Company's application in this proceeding is in the public interest.

WHEREFORE, in view of the foregoing, National Grid respectfully requests that it be permitted to intervene in this proceeding with all the rights that attend to such status.

Respectfully submitted,



Jeffrey A. Keevil

Missouri Bar No. 33825

Charles Brent Stewart

Missouri Bar No. 34885

Stewart & Keevil, L.L.C.

1001 Cherry Street, Suite 302

Columbia, Missouri 65201

(573) 499-0635

(573) 499-0638 (fax)

per594@aol.com (Mr. Keevil's email)

stewart499@aol.com (Mr. Stewart's email)

ATTORNEYS FOR NATIONAL GRID USA

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to those persons as ordered in the Commission's Order issued February 14, 2003, and to the Commission's General Counsel's Office on this 24th day of February, 2003.

