BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Aquila, Inc.)	
For an Accounting Authority Order Concerning)	Case No. EU-2005-0041
Fuel Purchases.)	

APPLICATION OF UNION ELECTRIC COMPANY, d/b/a AMERENUE TO INTERVENE

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE"), and pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, AmerenUE states as follows:

- 1. AmerenUE is a corporation duly organized and existing under the laws of the State of Missouri, with its principal office located at 1901 Chouteau Avenue, St. Louis, Missouri 63103, and is an electrical corporation, gas corporation and public utility as defined in Section 386.020, RSMo. (2000). AmerenUE is engaged in providing electric and gas services in portions of Missouri as a public utility under the jurisdiction of the Commission. AmerenUE is also engaged in providing electric and gas service in portions of Illinois.
- 2. On August 4, 2004, Aquila, Inc. ("Aquila") initiated this proceeding by filing an application with the Commission requesting authorization to defer "accounting treatment for certain fuel costs incurred by Aquila in providing electrical service during the period of April 22, 2004, through April 21, 2006." Essentially Aquila is requesting that the Commission issue an Accounting Authority Order to help insulate Aquila from the impact of extraordinary fluctuations in fuels costs that it has experienced.
- 3. AmerenUE seeks intervention because it believes that it will or may be impacted by the outcome of this proceeding. In particular, as an electric utility,

AmerenUE will be directly impacted by any new accounting treatment of fuel costs that the Commission may permit Aquila to adopt. If a particular accounting treatment is ultimately approved by the Commission in this proceeding, AmerenUE will consider proposing the adoption any such treatment of fuel costs for its own operations in the future. AmerenUE's interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding.

WHEREFORE, for the foregoing reasons, AmerenUE respectfully requests that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

Thomas M. Byrne, MBE No. 33340

Attorney for

Ameren Services Company

One Ameren Plaza

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

(314) 554-2514

(314) 554-4014 (FAX)

tbyrne@ameren.com

Dated: September 2, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 2nd day of September, 2004, served the foregoing Application of Union Electric Company, d/b/a AmerenUE, to Intervene either by electronic means, or by U. S. mail, postage prepaid addressed to all parties by their attorneys of record as provided by the Secretary of the Commission as shown below.

Mr. John Coffman
Office of the Public Counsel
200 Madison Street
Suite 650
P.O. Box 2230
Jefferson City, MO 65102-2230
jcoffman@ded.state.mo.us

Mr. Dan Joyce General Counsel Missouri Public Service Commission 200 Madison Street Suite 800 Jefferson City, MO 65101 d.joyce@psc.mo.gov Mr. Dean L. Cooper for Aquila, Inc. BRYDON, SWEARENGEN & ENGLAND P.C. 312 E. Capitol Avenue Jefferson City, MO 65102 dcooper@brydonlaw.com

Mr. Steve Dottheim General Counsel Missouri Public Service Commission 200 Madison Street Suite 800 Jefferson City, MO 65101 steve.dottheim@psc.mo.gov

Thomas M. Byrne