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April 20, 2001

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Governor Office Building
Jefferson City, MO 65101

FILED²
APR 23 2001
Missouri Public
Service Commission



Re: In the Matter of Laclede Gas Company's Tariff Filing to Implement an
Experimental Fixed Price Plan and Other Modifications to Its
Gas Supply Incentive Plan
MPSC Case No. GT-2001-329

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the
above matter, please find an original and eight (8) copies each of its Application
to Intervene and Response to Staff's Motion Permitting Use of Information and
For Expedited Treatment.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed
letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Thomas M. Byrne".

Thomas M. Byrne
Associate General Counsel

TMB/dla
Enclosures

cc: MPSC General Counsel
Office of the Public Counsel

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

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APR 23 2001
Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff Filing to Implement an)
Experimental Fixed Price Plan and Other)
Modifications to Its Gas Supply Incentive)
Plan.)

Case No. GT-2001-329

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

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), 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 a public utility as defined in Section 386.020 RSMo. (1996). AmerenUE is engaged in providing electric and gas service in portions of Missouri as a public utility under the jurisdiction of the Missouri Public Service Commission ("Commission"). AmerenUE is also engaged in providing electric and gas service in portions of Illinois.

2. This proceeding was established to address Laclede Gas Company's Gas Supply Incentive Plan, and proposed modifications thereto. On April 18, 2001 the Commission Staff filed a Motion for Order Permitting Use of Information and for Expedited Treatment ("Motion"). In its Motion, the Staff requests permission to utilize data provided to the Commission by other local distribution companies to perform a cost comparison between Missouri natural gas utilities. The Staff requests that the use of that

information be subject to treatment as Highly Confidential information under the Commission's protective order. The Staff served its motion on AmerenUE and the representatives of other local distribution companies in the state.

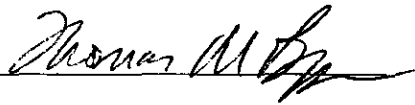
3. AmerenUE is requesting permission to intervene in this proceeding to permit the Commission to receive and consider its Response to the Staff's Motion which is being filed concurrently herewith. In addition AmerenUE believes that its intervention in this proceeding is appropriate and necessary to the extent the Staff intends to utilize information provided by AmerenUE to either support or oppose incentives for local distribution companies to acquire gas supplies in an optimal manner. AmerenUE's intervention in this proceeding will permit it to ensure that its gas supply information is adequately protected from improper disclosure, and it will enable AmerenUE to correct any erroneous conclusions about AmerenUE's gas supply operations that any of the parties may attempt to draw from this data. Because AmerenUE's gas supply information is implicated in this proceeding, 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.

4. AmerenUE recognizes that this application to intervene is being filed after the intervention date in this proceeding. However, the Company believes there is good cause to grant this intervention pursuant to 4 CSR 240-2.075 (5), since the Staff has only recently informed AmerenUE that it intends to use AmerenUE's gas supply data in this proceeding.

WHEREFORE, for the foregoing reasons, AmerenUE 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

By: 

Its Attorney

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Application to Intervene in Case No. GT-2001-329 was served on the following via overnight delivery on this 20th day of April 2001:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

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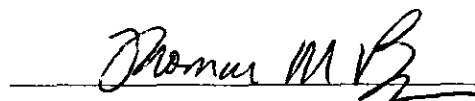
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