

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

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Integrated)
Resource Planning Standard as Required by) **Case No. EO-2009-0247**
Section 532 of the Energy Independence and)
Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Rate Design)
Modifications to Promote Energy Efficiency) **Case No. EO-2009-0248**
Investments Standard as Required by Section)
532 of the Energy Independence and Security)
Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Consideration)
SmartGrid Investments Standard as Required) **Case No. EO-2009-0249**
by Section 1307 of the Energy Independence)
and Security Act of 2007.)

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Smart Grid)
Information Standard as Required by Section) **Case No. EO-2009-0250**
1307 of the Energy Independence and Security)
Act of 2007.)

APPLICATION TO INTERVENE BY AARP

COMES NOW the AARP, by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075 and the December 17, 2008 order establishing these cases, and respectfully applies for intervention.

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan membership organization that advocates for people who are 50 years of age and older, seeking to promote

their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.¹ AARP operates staffed offices in all 50 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. There are approximately 755,000 AARP members currently residing in the state of Missouri.

AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of its priority issues.

Correspondence, communications, orders and the decision in this matter should be addressed to:

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
Ph: (512) 480-2426
E-mail: jbriesemeister@aarp.org

2. On December 17, 2008, this Commission issued an Order directing interested parties wishing to intervene to do so by January 16, 2009, and thus, this application is timely.

¹ In 1999, the “American Association of Retired Persons” changed its name to simply “AARP”, in recognition of the fact that people do not have to be retired to be members. AARP is incorporated as a 501(c)(4) organization. Its affiliated AARP Foundation is incorporated as a 501(c)(3) organization.

3. AARP has a history of professional participation before this Commission and before public utility commissions throughout the country, helping to provide a competent and substantial factual record in numerous cases. AARP is interested in any policy decisions that might be developed regarding SmartGrid investments, energy efficiency investments, and other matters included in Section 532 of the Energy Independence and Security Act of 2007, and the manner in which these issues may impact older residential electric consumers.

4. AARP's interest in this matter is different than the general public interest. Seniors are particularly vulnerable to increases in energy prices. Seniors also devote a higher percentage of their total spending than do other age groups on residential energy costs. Many seniors also have special needs and safety concerns with regard to their access to electric service.

WHEREFORE, the AARP respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

John B. Coffman MBE #36591
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

Attorney for AARP

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 16th day of January 2009:

General Counsel's Office
Missouri Public Service Commission
P O Box 360
Jefferson City MO 65102

Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102-2230

/s/ John B. Coffman
