BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric) Company d/b/a Ameren Missouri for Permission and) Approval and a Certificate of Convenience and Necessity) Authorizing it to Construct a Wind Generation Facility)

Case No. EA-2019-0021

APPLICATION TO INTERVENE OF THE MISSOURI DEPARTMENT OF CONSERVATION

The Missouri Department of Conservation ("MDC"), pursuant to 4 C.S.R. 240-2.075 and this Commission's October 22, 2018 *Order Directing Notice, Setting Intervention Deadline and Scheduling a Procedural Conference*, files its application to intervene and become a party in the above-captioned case. For its application, MDC states as follows:

1. MDC is a Missouri state agency created by § 252.020 RSMo, headed by the Missouri Conservation Commission created by Article IV, Section 40 of the Missouri Constitution. MDC's interests include the protection, management, restoration and conservation of Missouri's forest, fish and wildlife resources.

2. MDC's interests are different than that of the general public and may be adversely affected by a final order arising from this case.

3. Pursuant to 4 CSR 240-2.075(2), MDC states it does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

4. MDC's intervention will serve the public interest by assisting the Commission's record for decision in this case.

5. No party will be prejudiced by MDC's intervention.

6. This Application to Intervene is timely under the Commission's October 22, 2018

1

Order.

7. The Missouri Public Service Commission has previously recognized MDC's interest in proceedings affecting the state's forest, fish and wildlife resources in permitting MDC's intervention in a prior proceeding. *See* Case No. EA-2018-0202.

8. Correspondence, communications, orders and decisions in this matter should be addressed to the undersigned attorneys.

WHEREFORE, MDC requests that it be permitted to intervene and be made a party to this case for all purposes.

Respectfully submitted,

ELLINGER AND ASSOCIATES, LLC

By: /s/ Stephanie S. Bell Marc H. Ellinger, #40828 Stephanie S. Bell, #61855 308 East High Street, Suite 300 Jefferson City, MO 65101 Telephone No.: (573)750-4100 E-mail: mellinger@ellingerlaw.com E-mail: sbell@ellingerlaw.com

MISSOURI DEPARTMENT OF CONSERVATION

By: /s/ Jennifer S. Frazier Jennifer S. Frazier, #39127 2901 W. Truman Boulevard P.O. Box 180 Jefferson City, MO 65102-0180 Telephone: (573) 522-4115, ext. 3210 Facsimile: (573-751-4467 E-mail: jennifer.frazier@mdc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission, on this 30th day of October, 2018.

/s/ Stephanie S. Bell Stephanie S. Bell