

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

In the Matter of Union Electric Company d/b/a/ Ameren)
Missouri's Tariff Filing to Implement Changes to the)
Energy Efficient Natural Gas Equipment and Building) **Case No. GT-2011-0130**
Shell Measure Rebate Program)

In the Matter of the Energy Efficiency Programs of) Case No. GO-2011-0131
Union Electric Company d/b/a Ameren Missouri)

**MISSOURI DEPARTMENT OF NATURAL RESOURCES’
APPLICATION TO INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On October 21, 2010, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a proposed tariff to implement revisions to its “Missouri Energy Efficient Natural Gas Equipment and Building Shell Measure Rebate Program” (“Energy Rebate Program”) with the Missouri Public Service Commission. The Commission issued an *Order Consolidating Cases, Directing Notice, Setting Intervention Deadline and Directing Filing* on November 2, 2010. In its November 2, 2010, Order, the Commission established an intervention deadline of November 9, 2010.

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

3. MDNR serves as a member of the Residential and Commercial Energy Efficiency Collaborative “RCEEC” initially established by the Commission in Case No.

GR-2003-0517 and continued in Case No. GR-2007-0003 with representatives from Ameren Missouri, the Commission Staff, Office of the Public Counsel, and the Department of Natural Resources - Division of Energy. The RCEEC is authorized by the Commission, through a consensus process, to develop energy efficiency programs for Residential and General Service natural gas customers.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Division of Energy will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Division of Energy's review also will be in relation to the mandate set forth in Section 640.150, RSMo. which includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. Communications, correspondence, orders and decision in this matter should be addressed to:

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5. MDNR is uncertain at this time of the position it will take regarding the relief sought by Ameren Missouri in this case.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 9th day of November, 2010.

/s/ Sarah Mangelsdorf
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