

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

In the Matter of Ameren Missouri's)	
2012 Renewable Energy)	File No. EO-2013-0462
Compliance Report)	

**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 April 15, 2013, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its 2012 Annual Renewable Energy Standard Compliance Report pursuant to Public Service Commission Rule 4 CSR 240-20.100. The Commission opened Case No. EO-2013-0462 and on April 16, 2013, directed that notice be provided and that staff file a report of its review no later than May 30, 2013. The Order also directed that no later than May 30, 2013, the Office of the Public Counsel, and any other interested person or entity, may file comments regarding the report.

2. MDNR, and specifically its Division of Energy, is a state agency vested with the powers and duties set forth in § 640.150 RSMo. In addition, MDNR is tasked with certifying renewable energy resources pursuant to § 393.1025(5) RSMo.

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 report and plans from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. MDNR has a specific interest in encouraging renewable energy sources.

4. MDNR has not determined the specific position it will take in this case; however, the Division of Energy has an interest in participating in this matter.

5. Counsel for MDNR has previously entered an appearance in this docket, but has been informed that access to Highly Confidential versions of filings in the Commission's Electronic Filing and Information System (EFIS) will not be authorized until MDNR has applied for intervention and been made a party to this case.

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

Jeremy D. Knee
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-8795
Fax: 573-751-8796
Email: Jeremy.knee@ago.mo.gov

with a copy to:

Mary Ann Young
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102
Phone: 573-751-3335
Fax: 573-526-7553
Email: DNREnergyCases@dnr.mo.gov

WHEREFORE, MDNR respectfully requests that the Commission grant this Application to Intervene as soon as possible.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Jeremy D. Knee
Jeremy D. Knee, Bar No. 64644
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Phone: 573-751-8795
Fax: 573-751-8796
**Attorney for Missouri Department of
Natural Resources**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been transmitted by electronic mail to all counsel of record this 10th day of May 2013.

/s/ *Jeremy D. Knee*
Jeremy D. Knee
Assistant Attorney General