

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

In The Matter of Union Electric Company,     )  
d/b/a, AmerenUE’s Tariffs to Increase         )  
its Annual Revenues for Electric Service         )     Case No. ER-2008-0318  
   )

**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 4, 2008,, Union Electric Company, d/b/a AmerenUE (Company), submitted to the Commission proposed tariffs seeking to implement a general rate increase for retail electric service supplied by the Company. By order dated April 7, 2008, the Commission issued its Suspension Order and Notice Order Setting Hearings, And Order Directing Filing. In its April 7, 2008, Order, the Commission established an intervention deadline of April 28, 2008.

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

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center 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 Energy Center’s review also will be in

relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute 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.

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

Respectfully submitted,

JEREMIAH W. (JAY) NIXON  
Attorney General

/s/ Shelley A. Woods  
Shelley A. Woods  
Assistant Attorney General  
P.O. Box 899  
Jefferson City, Missouri 65102  
Bar No. 33525  
573-751-8795  
573-751-8464 (fax)  
[shelley.woods@ago.mo.gov](mailto:shelley.woods@ago.mo.gov)

**Attorneys for Missouri Department of Natural Resources**

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 23rd day of April, 2008.

Lewis Mills  
Office of Public Counsel  
P.O. Box 2230, Suite 650  
Jefferson City, Missouri 65102

Todd Iveson  
Assistant Attorney General  
P.O. Box 699  
Jefferson City, Missouri 65102-0899

Kevin Thompson  
General Counsel  
Missouri Public Service Commission  
P.O. Box 2230  
Jefferson City, Missouri 65102

James B. Lowry  
Smith Lewis, LLP  
P.O. Box 918  
Columbia, Missouri 65205

Steven R. Sullivan  
Sr. Vice President, General Counsel & Secretary  
Ameren Services Company  
P.O. Box 66149 (MC 1300)  
St. Louis, Missouri 63166-6149

Thomas M. Byrne  
Managing Associate General Counsel  
Ameren Services Company  
P. O. Box 66149 (MC 1310)  
St. Louis, Missouri 63166-6149

/s/ Shelley A. Woods  
Shelley A. Woods