

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

In the Matter of Ameren Missouri's)
Request For Variance from Portions of) File No. EE-2014-0024
4 CSR 240-20.065 and 4 CSR 240-20.100)

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

COMES NOW Missouri Department of Natural Resources ("MDNR")
and, pursuant to 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 July 29, 2013, Union Electric Company, d/b/a Ameren Missouri
("Ameren") filed its request with the Commission for a variance from certain
portions of the Commission's Net Metering rules in 4 CSR 240-20.065 and the
Commission's Electric Utility Renewable Standard Requirements in 4 CSR
240-20.100. Ameren also submitted modified tariffs: Rider SR – Solar Rebate
and Rider SP – SREC Purchase and Electric Power Purchases from Qualified
Net Metering Units. Ameren's July 29 filing corresponds to the recent
enactment of amendments to the Missouri Renewable Energy Standard,
§ 393.1030 RSMo, et. seq, effective August 28, 2013.

2. On July 30, 2013, the Commission issued an *Order Directing Staff Recommendation and Establishing Time to Intervene or to Object to Tariff*. In its July 30, 2013 Order the Commission established an intervention deadline of August 14, 2013.

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

4. 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 will also relate to the mandate set forth in § 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.

5. Communications, correspondence, orders and decision in this

matter should be addressed to:

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with a copy to:

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6. MDNR is uncertain at this time of the position it will take in this case.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that the Commission grant its request for intervention in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER

Attorney General

/s/ *Jeremy Knee*

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**Attorney for Missouri Department of
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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 14th day of August, 2013.

/s/ *Jeremy Knee*

Jeremy D. Knee