

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

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Tariffs to Implement Changes)	<u>Case No. ET-2012-0011</u>
to its Electric Energy Efficiency Programs)	

**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 25, 2011, Union Electric Company d/b/a Ameren Missouri (Ameren) filed a request for approval of Residential Electric Energy Efficiency Bridge Tariffs, filing letter and tariff sheets with the Missouri Public Service Commission (PSC). The PSC has opened Case No. ET-2012-0011 to consider the request, and on October 26, 2011, issued a *Notice of Tariff Filing and Order Establishing Time to File Recommendations*. The Order sets a November 9, 2011 deadline for interested parties to intervene and a November 14, 2011 deadline for interested parties to file a recommendation.

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 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 AmerenUE 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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**Attorney for Missouri Department of Natural
Resources**

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 2011.

/s/ Jessica L. Blome
Jessica L. Blome