

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

In the Matter of Ameren Missouri's )  
Submission of its 2013-2015 RES ) File No. EO-2013-0503  
Compliance Plan )

**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 May 28, 2013, Ameren Missouri ("Ameren") filed its 2013-2015 Annual Renewable Energy Standard Compliance Plan and Report pursuant to Commission Rule 4 CSR 240-20.100. The Commission opened Case No. EO-2013-0503 and on May 29, 2013, directed that notice be provided and that staff file a report of its review no later than July 12, 2013. The Order also directed that no later than July 12, 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. Communications, correspondence, orders and decision in this matter should be addressed to:

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

Respectfully submitted,

**CHRIS KOSTER**  
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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 mailed, hand-  
delivered, transmitted by facsimile or e-mailed to all counsel of record this  
11th day of June 2013.

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